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Landsberg

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

UNITED STATES OF AMERICA,
PLAINTIFF,

versus

CIVIL ACTION NO. 2584

VICTOR B. ATKINS, AUBREY C. ALLEN,
and JOSEPH BIBB, REGISTRARS OF
VOTERS OF DALLAS COUNTY, ALABAMA;
and STATE OF ALABAMA,

DEFENDANTS.

APPENDICES A THROUGH E FOR
BRIEF IN SUPPORT OF
PLAINTIFF'S MOTION
FOR SUPPLEMENTAL RELIEF.

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Appendix A contains a summary of the testimony and applications of each Negro witness who testified about his registration experiences. Each summary identifies the applications by exhibit number, date, and Board action. Following this list of the application forms is a statement of the facts showing the witness to be qualified to register under Alabama law as applied by the Board. To be qualified, an applicant must be at least twenty-one years of age. He must have been a resident of Alabama for one year, and of his county for six months prior to any election in which he seeks to vote. ^{*}/The applicant must be of good character and must embrace the duties and obligations of citizenship. Finally, he must be able to read and write any article of the Constitution of the United States. See Constitution of Alabama, Art. VIII, §§ 177 - 96; Code of Alabama, Tit. 17, §§ 1 - 426 (1958).

The last sections of the summary contain an account of each of the applicant's attempts to register. Most accounts state what happened at the time of the application, as, for example, whether oral questions were asked. Then, each account contains a review of the application and of the possible reasons for rejection.

Sources of the summaries are the applications and the Unofficial Transcript (UT).

^{*}/The requirement of three months residence in the precinct is not enforced by the Board. See, e.g., Table IV for a list of white and Negro accepted forms on which Q5b has not been fully answered.

Summary
of the
Testimony and Applications
of
OPHELIA BADY
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
August 5, 1963	Rejected	B-131
October 18, 1963	Rejected	B-265

Facts Showing Qualifications

Age: Both of Mrs. Bady's applications show that she was born October 17, 1936, more than 21 years prior to either application.

Residence: Both of her applications show her to have been a resident of Dallas County since her birth. Her second application does not show when she became a resident of her ward or precinct, but both applications show that she had not changed her address for at least five years prior to her applications.

Character: Each of her applications shows that Mrs. Bady has not been convicted of any disqualifying crimes and otherwise meets the character qualifications.

Loyalty: Mrs. Bady's answers to the questions concerning her loyalty were correct on both applications.

Ability to Read and Write: Both of Mrs. Bady's applications show her to be a high school graduate. She has filled out both application forms responsively and legibly.

Registration Experiences

August 5, 1963

1. While Mrs. Bady was in the front room filling out her application, a person told her she could cross out mistakes and initial them, rather than filling out a new questionnaire. She then went into a back room. There, two men took the application blank, swore her in, and asked her the duties of the President and Vice-President. She answered that the duties of the President were to govern to the best of his knowledge and that the duties of the Vice-President were to fill the vacancy of the President (UT 448). The men gave her no assistance and said nothing else, except that she would hear from the Board in two or three weeks (UT 448, 449).
2. She received a notice of rejection, indicating that she had "failed to answer correctly one or more pertinent questions." There is no specific indication on her application form as to the reason for Mrs. Bady's rejection. No question is circled, but at the top of the third page

is the notation, "QUESTIONS: NO." Each question on the questionnaire was answered responsively and adequately.

October, 1963
(uncertain date)

Mrs. Bady went to the Registrars' Office about four different times in the month of October before she finally was allowed to register. On each of those days she left when told that all the numbers were given out and that there was no use to wait. She was told each time to come back in the morning and get a number (UT 449).

October 18, 1963

1. On the day Mrs. Bady was allowed to apply the second time, she had to wait in line from about 6:30 in the morning until about 11 o'clock that morning (UT 449). She filled the form out, gave it back, and then went into the same back room. There she was asked oral questions. One of those questions was something about the Constitution, to which Mrs. Bady did not know the answer. She had asked the questioner whether she had to answer and was told, "No." She then said, "I would rather not answer it," and was told she would hear from the Board within two or three weeks (UT 450).

2. She was sent a notice of rejection which said, "You failed to answer correctly one or more pertinent questions." On this application there is a circle marking Question 4(b), in which she put her precinct number, but not the date of residence. In all other respects this application is completed perfectly. On the top of page three of her application is a notation which says, "QUESTIONS: - 'I better not answer' - No."

A - 1 - d

Summary
of the
Testimony and Applications
of
CRANDELL CHESTNUT BROWN
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
April 1, 1963	Rejected	B-28
June 3, 1963	Rejected	B-71
August 5, 1963	Rejected	B-133
October 7, 1963	Rejected	B-197

Facts Showing Qualifications

Age: All applications indicate that she was born on September 22, 1929. She was over 21 each time she applied.

Residence: Her application forms show that she has been a resident of Dallas County since sometime between October 15, 1931 and June 5, 1932, at which time she would have been three years old.

Character: Each of her applications show that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each of her four applications she swore under oath to support and defend the State and federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or federal government by unlawful means. She also affirmed her loyalty by her responses on each of her applications.

Ability to Read and Write: Her application forms show her to be a junior college graduate. She has filled out all four application forms responsively and legibly.

Registration Experiences

April 1, 1963

1. She was not able to walk right in the registrar's office. She stated at the trial, "I wasn't ever able to walk right in. I would always have to stand in line, and I am not positive, but it was either April or June when I stood there that morning, and then had to come back that afternoon" (UT 482, 483). She filled out an application form and was taken into the back room. She was asked to name the departments of government. She named the Judicial, Executive, and Legislative departments (UT 481). She

was then asked about the duties or the functions of each of these branches. She answered part of this question. She stated that the President was over the Executive Department and that the Supreme Court was over the Judicial Department, but she did not say that Congress was over the Legislative Department. (UT 482).

2. She was sent a notice of rejection which indicated that she had "failed to answer correctly one or more pertinent questions." There is no specific indication on her application form as to the reason for the rejection: Question 2(b) is circled on the first page; she omitted the date upon which she became a bona fide resident of the precinct. There is also a question mark by Question 1 indicating that she did not give her present address. The following notation appears at the side of Question 1: "1609 Lapsley Street - Now." A small question mark appears by her answer to Question 13, which relates to membership in organizations advocating the overthrow of the United States government. This question is answered "None." Another small question mark appears beside her answer to Question 17, which relates to the duties and obligations of

citizenship, which she answered as follows
"To support all charitable organizations,
to vote, to support my community morally
as well as financially, to respect all
laws of the community and State, to
respect the flag." The notation "Consti-
tution - No" appears on page three of the
application form.

June 3, 1963

1. She was asked some questions in the back room. One question concerned who was over the Executive Department. She answered this by stating that the President was over the Executive Department. She was then asked the duties of the President. She stated that he was the only man who could give a person a reprieve if that person had been tried for treason (UT 483). She was then asked the duties of the Vice-President. "I told him that the Vice-President takes over in case anything happens to the President, and he told me that that wasn't enough. He said that he wanted a specific duty . . ."
- The registrar asked her whether she thought it fair for her to become a registered voter if she could not name a specific duty of the Vice-President.

She told him that she just didn't understand why she would have to go through so much just to become a registered voter (UT 484, 85).

2. She was sent a notice of rejection which said, "You have failed to answer correctly one or more pertinent questions." There is no specific indication on her application form as to the reason for the rejection. Question 18(b) is circled, but there is a notation above the circle which reads "O.K." A notation appears on page three which reads as follows:
"Questions - No."

August 5, 1963

1. No testimony appears concerning this registration experience.
2. She was sent a rejection notice which said, "You failed to answer correctly one or more pertinent questions." There is no specific reason on her application form as to the reason for the rejection. The only notation on the form appears on page 3 and reads, "Questions - No."

October 7, 1963

1. She described her experience on this day as follows, "That was the hot day that I went down a little before nine o'clock,

and I stood out in the sun several hours,
and I got a chance to get in that afternoon.
I stood in line until they came from lunch,
and I wasn't allowed to leave the line.
The water was unplugged, and there were
Sheriff's deputies standing around, and if
you left the line you were to go to the
end, which was about two or three blocks
away." (UT 485) When she went into the
back room, she was asked to name the duties
of a Federal Senator, but she did not
name them (UT 486).

2. She was sent a notice of rejection which
said, "You failed to answer one or more
pertinent questions." There is no specific
indication on her application form as to
the reason for her rejection. The only
notation on the form appears on page 3
and reads as follows "Question: No."

Summary
of the
Testimony and Application
of
MYRTLE H. BROWN
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
August 19, 1963	Rejected	B-169

Facts Showing Qualifications

Age: Her application form indicates that she was born on May 7, 1921. She testified that she was forty-three years old (UT 307).

Residence: Her application shows that she has been a resident of the State of Alabama since May 7, 1921, a resident of the County since June, 1949, and a resident of the precinct since July 28, 1961.

Character: Her application shows that she has not been convicted of any disqualifying crime and that she otherwise meets the character requirements.

Loyalty: On her application form she swore under oath to support and defend the State and federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the United States government or the government of the

State of Alabama by unlawful means. She affirmed her loyalty by her responses on her application.

Ability to Read and Write: Her application shows her to be a college graduate with eleven years of teaching experience. Her answers are clear, responsive, and legible.

Registration Experiences

August 19, 1963:

1. She filled out the application form and was asked to go into the back room. She was asked several questions, including one about the duties of the President of the United States (UT 308). Her answer to the question concerning the duties of the President was that "the President of the United States is to see that the laws of the land are carried out, and to appoint the Executive Branch of the Government and to serve as Commander-in-Chief of the Armed Forces during times of war" (UT 309). Another question asked her was "who is the Vice-President of the United States." Her response was "Lyndon B. Johnson" (UT 309). Though not altogether certain about it, she believes that she was asked about the duties of the Vice-President (UT 309). Her answer was that he was to "preside over the Senate of the United States and to act in place of the President

of the United States once he was removed from office or in case of death" (UT 309). She was also asked a question about something dealing with the "powers of the State, of our State of Alabama, and the powers of the Governor of the State in relation to the United States Government." Her reply was that "the powers, whatever they are, were all right if they were not in conflict with the Federal Government" (UT 310).

2. She later was sent a notice of rejection which stated that, "you failed to answer correctly one or more pertinent questions." There is a question mark written on her form in the margin of question number 2, pertaining to attempts to register. Her answer to part (a) of question 2 was: "I filled out application blanks, but received no word from the board." The words "QUESTIONS: NO" are written at the top of the oath page.

Summary
of the
Testimony and Application
of
LOUVENIA CADE
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
August 17, 1964	Rejected	B-673A

Facts Showing Qualifications

Age: Her application indicates that she was born August 9, 1928.

Residence: Her application indicates that she has been a lifetime resident of Selma, Alabama, in Dallas County. She testified as to her lifetime residence in Selma (UT 225).

Character: Her application shows that her only conviction was for driving without a license, which conviction does not constitute disqualification under Alabama law. The form shows that she otherwise meets the character qualifications.

Loyalty: On her application she swore under oath to support and defend the Constitution of the United States of Alabama. She also by oath disavowed belief in and affiliation with any

group which advocates the overthrow
of the State or Federal governments
by unlawful means.

Ability to Read and Write: Her application shows
her to be a college graduate. She
testified that she is a school teacher
(UT 225). She demonstrated her ability
to read by reading numbers 1 and 2 of
the excerpts from the Constitution.
Her application is filled out respon-
sively and legibly.

Registration Experience

August 17, 1964:

1. She filled out her application form and
took it into the back room, where two men
were sitting. One man handed her a piece of
paper upon which she wrote her explanation
of Constitutional excerpt number three, deal-
ing with the appointment of electors (UT 226).
Her explanation was as follows: "This means
that the state will have the number of electors
and representatives that they are entitled too.
But if he is holding a position he can not hold
another office." She was also given a spelling
test and in response to the words dictated she
wrote: "succession," "affirmation," "incerection-
ion," "rebellion." The registrar dictated ~~and~~
another word, which she didn't understand, but

which she thought may have been "seized" (UT 227).

She told the registrar that she didn't understand him and handed him back the paper.

2. She was sent a notice of rejection which said, "You failed to answer correctly one or more pertinent questions." Printed in above her written word in the dictation is the word "AFFIRMATION," and printed in also is the word "SEIZED." In the excerpts from the Constitution on her form the words "Excerpts," "inhabitant," and "apportionment" are circled. A circle also appears on the back side of the insert page beneath her written explanation of excerpt No. 3.

Summary
of the
Testimony and Applications
of
BEULAH COLLINS
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
October 15, 1963	Rejected	B-235
July 28, 1964	Rejected	B-665

Facts Showing Qualifications

Age: Each of her applications indicates she was born on January 10, 1894, and she testified she was seventy years old (UT 152).

Residence: Each of her applications show her to be a resident of Dallas County and to have resided in that county since birth. She has lived in Selma twenty or twenty-five years (UT 152).

Character: Each of her applications show that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications. She has never been arrested (UT 153).

Loyalty: On each of her applications she swore under oath to support and defend the State and federal constitutions and disavowed belief

in and affiliation with any group which advocates the overthrow of the State or federal governments by unlawful means. She also affirmed her loyalty by her responses on each of her applications.

Ability to Read and Write: Her applications show she has completed four years of college and has taught public school. She is a retired school teacher with a B. S. Degree from Alabama State College, Montgomery, Alabama (UT 153), and was a teacher in Selma, Alabama, for forty-four years (UT 153). Her applications are filled out legibly, and she demonstrated her ability to read by reading excerpts of the Constitution, as printed on her application form, at the trial of this cause (UT 153).

Registration Experiences

October 7, 1963

She went to the courthouse to register at nine o'clock and found a line outside, consisting mostly of colored people, that extended from the courthouse to the end of the block and then into the next block (UT 153, 54). She took her place in line in the middle of the second block (UT 154). She stood in line and was not permitted by the officers in charge to get out of line at all without losing her place (UT 154, 55). She left the courthouse about four o'clock (UT 157).

October 8, 1960

She went to register again at nine-thirty or nine o'clock. There was a large number of people there, mostly Negroes, but not as many as the first day (UT 156).

The registration was inside the court square, in the back of the courthouse on the back side. She got up in the line as far as the steps and she left when they closed, about four in the afternoon (UT 156-157).

October 13, 1960

1. On this third occasion she went to the courthouse at seven o'clock and was given number 2, but later when the people came who were not registered the day before, they came and this number was taken up from her and she was given number 24 (UT 157). She got into register that day just before four (UT 157). She filled out the questionnaire and was told to go into the next room. (UT 159). The people were taken into the back room one at a time and she had to wait for the person ahead of her to come out before she went in (UT 159). She was asked the names of the United States Senators from Alabama. She answered "Senator Lester Hill, and Senator John Sparkman." She was also asked the duties of the Senators. Her reply was that "the duties of the Senators were to look after

the interests of the people whom they represented"(UT 160, 161). She remembered a third question was something about who was the Representative or something. The Registrar did not tell her if she failed or passed and he said "You may come back in sixty days; come back within sixty days" (UT 161).

2. She received a notice of rejection stating that she "failed to answer correctly one or more pertinent questions." There is no specific indication on her application form as to reason for the rejection; but question 8 is circled, she had given no answer to the question "Has your name been previously stricken from the list of persons registered." Question 20(b) is circled, where she omitted the date upon which she became a bona fide resident of her precinct. Also in question 10 the word "places" is circled in the question that calls for the names of places where the applicant has lived for the last five years. The answer given is "permanent resident."

July 20, 1964

1. The registrar filled in Part I of the form and asked her some questions as to age and birth date (UT 164). She read excerpts from the Constitution and was required to write and spell words (UT 165). She was asked to explain one of

the Sections of the Constitution (UT 165). After she finished the form, she was told "You may come back -- don't come before sixty days" (UT 165).

2. She received a notice of rejection which said, "You failed to answer correctly one or more pertinent questions." On her application the words "when and where" on question 11 are circled; she had said, yes, she had been denied registration as a voter, but she failed to say when or where.

On the excerpt part of the insert, the following words were circled: judicial, prosecuted, and prejudice. She demonstrated her ability to read these words by reading these excerpts aloud to the Court at the trial of this cause (UT 168). In the space for writing from dictation she wrote correctly the following words: despotism, seizures, infringed, intoxicating, and impartial. There is an ellipse marked next to her written interpretation of the Tenth Amendment. Her interpretation was,

The State has power of free election in it on States, power to govern it school and to levy such taxes as necessary to carry forward it affairs with the state.

Summary
of the
Testimony and Application
of
EMMA J. CRAIG
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
April 1, 1963	Rejected	B-29
June 3, 1963	Rejected	B-73

Facts Showing Qualifications

Age: Both applications state her length of residence in Dallas County to be since birth and length of residence in her Ward or precinct to be since 1935.

Character: Both applications show that she has not been convicted of any disqualifying offense and that she otherwise meets the character requirements.

Loyalty: On both applications she swore under oath to support and defend the State and federal constitution and disavowed belief in and affiliation with any group which advocates the overthrow of the State or federal governments by unlawful means. She also affirmed her loyalty by her responses on both applications.

Ability to Read and Write: Both applications show her to be a high school graduate. She completed both forms in a responsive and legible manner.

Registration Experiences

April 1, 1963:

1. She completed her application form and was then asked some oral questions; she does not remember what the questions were (UT 579).
2. She was later sent a notice of rejection giving as a basis, "You have failed to answer correctly one or more pertinent questions."

Her application form shows no indication of errors or omissions except the notation: "Constitution: No." In answer to Question 21, "Name some of the duties and obligations of citizenship," she replied, "To be loyal to community and State, and see that the laws are enforced. If you know of anything is going to happen to over throw the United States, to notify the Athoritys."

June 3, 1963:

1. She filled out the application form at the registration office and was then asked some oral questions, which she does not remember (UT 579).
2. A notice was later sent to her stating that her application had been rejected because

"You have failed to answer correctly one or more pertinent questions." Her application form contains no indication of errors or omissions except the notation, "Question - No." In answer to the question: "Name some of the duties and obligations of citizenship," she replied: "To be true and loyal to county and state of Ala, and obey the laws of the county and State."

September 1963:

She went to the registration office in an attempt to register but was unable to get in (UT 580).

November 1963:

She returned to the registration office and was given a number, 40. After remaining in line some two hours, she withdrew (UT 580-81).

Summary
of the
Testimony and Application
of
BESSIE G. DIXON
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
October 17, 1964	Rejected	B-259

Facts Showing Qualifications

Age: Her application shows her date of birth to be November 9, 1921.

Residence: Her application shows her to have been a resident of Dallas County since 1945.

Character: Her application shows that she has not been convicted of any disqualifying crime and otherwise meets the character qualification.

Loyalty: On her application she swore under oath to support and defend the State and federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or federal governments by unlawful means. She also affirmed her loyalty by her responses to questions.

Ability to Read and Write: Her application shows her

to have a high school education and four months of nurse's training. She is a nurses aide by occupation.

Registration Experiences:

October 17, 1964:

1. In the second day of waiting in line at the registration office she was admitted. She had remained in line all day until the office closed on October 16 (UT 603). After filling out and turning in her application form, she was directed to the back room where she was asked one question: "What are the duties of Congress?" She answered: "Congress could pass a bill, or they could veto it," (UT 604).
2. Two weeks later she was notified that her application had been rejected because she had "failed to answer correctly one or more pertinent questions." There is a circle marking question 7(b), in which she omitted the date of residence in her precinct. In all other respects this application is completed perfectly. At the top of page 3 of her application is a note which says, "Question: - NO."

Summary
of the
Testimony and Applications
of
BESSIE SUTTLE DURRY
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
February 17, 1964	Rejected	B 522
June 15, 1964	Rejected	B 581

Facts Showing Qualifications

Age: Born August 27, 1930.

Residence: Both applications show her to be a resident of Dallas County since birth.

Character: Both applications show that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On both applications she swore under oath to support and defend the State and federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or Federal governments by unlawful means.

Ability to Read and Write: Both applications show her to be a high school graduate. She has filled out both application forms responsively and legibly.

Registration Experiences

February 17, 1964

1. She filled out her application form in the presence of Col. Bibb. Then Col. Bibb required her to write words dictated by him (UT 518). She wrote down three words and, at the instruction of Col. Bibb, wrote "Don't know" for the words she did not understand (UT 519).
2. She was sent a notice of rejection which said, "You failed to answer correctly one or more pertinent questions." In the excerpts from the Constitution section of this application there are circles around the words "construed," "equity," "apportioned," and brackets around the word "apportionment." No questions are marked on the application and there are no omissions.

June 15, 1964

1. In the excerpt from the Constitution section in her application form of this date the following words are circled: "seizures," "seized," "levying," and "adherring." The words "misdemeanors," "consuls," "discipline," and "concurrence" were incorrectly spelled. Question 9, dealing with previous employment, was left blank and is circled.
2. She was sent a notice of rejection which said, "You failed to answer correctly one or more pertinent questions."

Summary
of the
Testimony and Applications
of
HORACE EUGENE ECHOLS
(Negro)

Application Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
May 20, 1963	Rejected	B-53
October 28, 1963	Rejected	B-296
September 21, 1964	Unknown	(Pl. Ex. No. 1)

Facts Showing Qualifications

Age: His applications indicate that he was born on February 22, 1905. He was over 21 each time he applied.

Residence: His applications show him to be a resident of Dallas County. He has lived in Selma for about 27 years (UT 352).

Character: Each of his applications show that he has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each of his applications he swore under oath to support and defend the State and Federal Constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or Federal governments by unlawful means.

Ability to Read and Write: All of his applications show him to be a college graduate. He has been a school principal. He filled out all of the application forms responsively and legibly.

Registration Experiences

May 20, 1963:

1. He filled out an application in the front room for Mr. Atkins (UT 354). He then went to the back room, swore to tell the truth, and was asked at least one question concerning the meaning of the word "bona fide" (UT 356). He answered that the words were French ones which meant "good faith" (UT 356).
2. He was sent a notice of rejection which stated, "You have failed to answer correctly one or more pertinent questions." On this application there is a circle marking question 10(b), in which he omitted the date of residence in his precinct. In all other respects this application is completed perfectly. Above the oath section of the application is a note which says, "Questions-No."

October 28, 1963:

1. He filled out another application form, went to the back room, and was asked orally, "Who makes the laws of this country?" He replied "Mr. Hill and Mr. Roberts" (UT 359). He was also asked to name two duties of the Federal Senators (UT 365).

2. He was sent a notice of rejection which said, "You failed to answer correctly one or more pertinent questions." In all respects this application is completed perfectly, and there are no indications that any written question was answered incorrectly. Preceding the oath section there is a note which says, "Questions-No."

September 21, 1964:

1. The applicant wrote from dictation part of a section of the U. S. Constitution. Two question marks follow his writing. An "X" appears by a printed excerpt from the Constitution on the form as a probable indication that the applicant only wrote about half of the words in the printed passage.
2. There is no indication as to whether the applicant has been accepted or rejected in the application-form record. J. R. Bibb has signed the "rejected" form called "Action Of The Board," but no other Registrar appears to have taken action, and the date and reason blanks are not filled out. Question 4 under "Instruction "B" is circled although the applicant has correctly indicated that Congress can pass a bill over the President's veto. Question 1 under "Instruction "C" is circled in which the applicant answered "Congress"

when requested to name a section of the Constitution dealing with patents and copyrights. In the margin beside question 2 under "Instructions" is written a question mark and the word, "Treason." The applicant had answered that the offense of a citizen who aids in levying war against this nation is "Spying." The word "AND" and a question mark follow the applicant's answer to question 4 of the same section in which the applicant named two authorities "in whom Congress may vest the power to appoint inferior officers." It was requested that he name three such authorities.

Summary
of the
Testimony and Application
of
LOUISE EDWARDS
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
October 30, 1963	Rejected	B-380

Facts Showing Qualifications

Age: Mrs. Edwards' application shows her to have been born in 1923.

Residence: Her application shows her to have been a resident of her precinct or ward since birth.

Character: Her application shows that Mrs. Edwards has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: Mrs. Edwards signed the oath and gave appropriate answers to all questions concerning her loyalty.

Ability to Read and Write: Her application shows her to have finished the tenth grade. Her application form is completed responsively and legibly.

Registration Experiences

Prior to October 30, 1963:

Mrs. Edwards waited in line from about 11 o'clock until closing time on one day and from about seven o'clock in the morning until closing time on another day, without being given an application form. These days were apparently the two days immediately preceding October 30 (UT 475).

October 30, 1963:

1. On this date, Mrs. Edwards was finally given an application form sometime before three o'clock in the afternoon. After she had filled out the application, she took it into another room, where two board members questioned her. One asked her if she were still working; her answer was no. Another man gave her a slip of paper to read; after she had read what appeared on the paper she said, "Title 10," and he said, "Title 9." Then he asked her to explain what she had just read, and she gave a short answer. The answer was, "The rights of citizens means that we should respect each other. It means voting, and I have a right to vote." Mrs. Edwards explains that she was concerned about all the people standing in line and did not want to take any more time. One of the men then

asked her to take an oath, which she did,
and then she left (UT 477).

2. Mrs. Edwards received a notification of rejection which stated that she had "failed to answer correctly one or more pertinent questions." There appears to be no notations on the questionnaire. It is filled out perfectly. On the third page, at the top, there appears the notation, "Question: - No."

Summary
of the
Testimony and Applications
of
EVELYN ETHERIDGE
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
March 18, 1963	Rejected	B - 21
June 17, 1963	Rejected	B - 91
August 19, 1963	Rejected	B - 172
November 18, 1963	Rejected	B - 446
April 20, 1964	Rejected	B - 556

Facts Showing Qualifications

Age: All of her applications indicate that she was born on August 25, 1938. She was over 21 each time she applied.

Residence: Each of her applications shows her to be a resident of Dallas County and to have resided in this county since 1938. She has lived in Selma since birth (UT188).

Character: Each of her applications shows that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each of her five applications she swore under oath to support and defend the State and federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or federal governments by unlawful means. She also affirmed her loyalty by her responses on each of her applications.

Ability to Read and Write: All of her applications show her to be a high school graduate. Four of her applications shows she is a clerk-typist by occupation. She has filled out all five application forms responsively and legibly and has demonstrated her ability to read at the trial of this cause. (UT 198,200).

Registration Experiences

March 18, 1963

1. She filled out her application form and waited her turn to go into the next room. She was asked oral questions. To the question, "What two houses are Congress made of," she replied, "the House of Representatives and the House of Senate." (UT 191). The next question was, "What are the duties of the Federal Government?" She asked, "You mean the Constitution?"

The questioner said, "Answer it any way you see fit." She answered, "The Constitution is a body of laws set down by the Federal Government stating the rights of American citizens. They are the highest laws of the land"(UT 191).

2. She received a notice of rejection which indicated she, "failed to answer correctly one or more pertinent questions." Her application is filled out legibly and responsively. There are no questions marked, and the application contains no errors or omissions. On the top of the oath page is a note which says, "Constitution: - No."

June 17, 1963:

1. She entered the Registration room, and the Registrar asked her if she had been in to register before and if it had been 60 days or more. (UT 193). She filled out the form and waited her turn to go into the next room to be sworn in (UT 193). She was sworn in by Colonel Bibb, and he asked her "What are the duties of the Vice-President." Her answer was, "to take the place of the President in his absence"(UT 194) She was also asked for the Vice-President's name, and she answered, "Lyndon Baines

Johnson" (UT 194). There were other questions asked that day, but she could not remember them. She was not sure that the specific questions mentioned above were asked at this time or on her third attempt. However, she was sure these questions were asked (UT 194).

2. She was sent a notice of rejection indicating she had "failed to answer correctly one or more pertinent questions." On this application there is a circle marking question 14(b), in which she omitted the date of residence in her precinct. In all other respects this application is completed perfectly. In answer to question 16, "Have you previously applied for and been denied registration as a voter" she answered "yes." On the top of the oath page of her application is the notation, "Questions, No."

August 19, 1963

1. After filling out the form she went into a back room again. She was not sure whether she was given oral questions or whether it was reading or spelling. She did not remember (UT 196).

2. She was sent a notice of rejection which gave as the reason, "False Oath." Her application is completed perfectly except that in question 18, which asks "Have you previously applied for and been denied registration as a voter; she answered "No" The question number and the "No" are circled. At the time she made out the application, no one called to her attention the "No" answer (UT 197). She explained her reason for signing and saying "No" was because "I proof-read it, but I had signed at that time, I know, and I just guess I just didn't read it with understanding" (UT 197).

November 18, 1963

1. She filled out the application and went into the back room and was asked to read aloud and write her understanding of a passage of the Constitution (UT 198), which was:

Reserved Rights of People:
The enumeration in the
Constitution of certain
rights, shall not be con-
strued to deny or disparage
others retained by the
people.

She demonstrated her ability to read this passage at the trial of this cause (UT 198). Her understanding of this passage.

as written on the application was,

"To my knowledge, the above statement means if we qualify to answer the questions on the Application of Registration, and obey all laws of the Constitution, we should be entitled to become Register Voters, and not be denied the Priviledge."

2. The registration records do not contain a notice of rejection for the application. There are no questions marked on the application and the application contains no errors or omissions. In answering the question concerning previous registration experience, she did say this time that a prior application had been denied.

April 20, 1964

1. After she finished filling out the form she went into the back room and was asked to fill out Insert Part III (3). She was asked to read certain excerpts from the Constitution. She had no difficulty with the reading at the trial of this cause (UT 200). She was asked to spell words. One word sounded to her like "alfirmative" or "alformation" (UT 200). She spelled this word on her form as "alfrimation." When asked at the trial of this cause to spell "affirmation,"

she correctly spelled this word (UT 200).

On her forms she spelled correctly, impeachment, tranquility, postscript and establish.

2. She received a notice of rejection stating that she had failed to answer correctly one or more pertinent questions." On her application directly underneath her writing of "Affirmation" is the printed word "Affirmation" and underneath her writing of "Tranquility" is the printed word "Tranquillity". She testified the printed word "Tranquillity" spelled with two L's was not her handwriting. Again she indicated on the form she had previously applied for and been denied registration as a voter.

Summary
of the
Testimony and Applications
of
WILLIE EVANS
(Negro)

Applications Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
February or March 1952	Unknown	None
About 3 months later	Unknown	None
May 6, 1963	Rejected	B-42
July 5, 1963	Rejected	B-115
September 16, 1963	Rejected	B-190
January 27, 1964	Rejected	B-456
May 12, 1964	Rejected	B-574
July 20, 1964	Rejected	B-662

Facts Showing Qualifications

Age: All of Mr. Evans' applications in evidence show that he was born on August 28, 1914.

Residence: Each of Mr. Evans' applications in evidence show that he has been a resident of Dallas County since birth. The second, third, and fourth applications show that he has been a resident of his ward or precinct since 1944 at

the latest. His first application in evidence does not contain a date on which he became a resident of the ward or precinct, but question 17 of that application shows that he had not changed his address during the five years prior to his application. The last two applications in evidence do not contain a date upon which he became a resident of his precinct, ward, or district; the line for that date is below the line for length of residence.

Character: Each of his applications shows that he has not been convicted of any disqualifying crimes and otherwise meets the character qualifications.

Loyalty: Each application contains appropriate answers to the questions concerning loyalty.

Ability to Read and Write: Each of his applications in evidence shows that Mr. Evans completed the ninth grade. He has served in the Armed Forces.

Registration Experiences

February or March 1968:

Mr. Evans filled out an application form, but received no word from the Board of Registrars (UT 408).

Three Months later:

On this occasion, Mr. Evans also filed an application form, but was not notified of any Board action (UT 400).

May 6, 1963:

1. After filling out his registration form, Mr. Evans went into a back room to see Mr. Bibb. Mr. Bibb took the application and asked a question that Mr. Evans did not understand. The applicant thought Colonel Bibb asked him to "define the man in the street, not technical but sexually." Mr. Evans asked the Colonel to repeat the question, that he had not quite understood it. Mr. Bibb did repeat his question, but Mr. Evans still did not understand the question, so the interview terminated (UT 400,10).
2. Mr. Evans received a rejection notice stating that he had "failed to answer correctly one or more pertinent questions." There is a circle around question 10, which deals with residence. Mr. Evans did not state when he became a resident of Alabama or when he became a resident of his ward or precinct.

However, he did state when he became a resident of Dallas County, which is in Alabama, and had stated elsewhere that he had not changed his address in the last five years. There is a comment in the margin beside either question 18, which deals with employment, or beside question 19, dealing with residence. The comment appears to be, "See No. 1" or "See No. 2." Question 1 asks for the applicant's present address, which Mr. Evans gave, while question 2 asks if his name had been previously stricken from the list of persons registered, to which Mr. Evans replied No. There is a question mark in the margin beside question 21, which asks if the applicant has previously applied for and been denied registration as a voter and, if so, asks the applicant to give the facts. Mr. Evans stated that he had been denied registration previously, but said that the facts were "unknown." There are no other errors on this application. There is a notation at the top of page three, "authorized question - no answer."

July 5, 1963

1. After filling out his application form, Mr. Evans was asked about the duties of the President. He said that one of the duties of the President was to be Commander-in-Chief in the Armed Forces and another was to preside over the Cabinet (UT 411).
2. Mr. Evans again received a notice of rejection stating that he had "failed to answer correctly one or more pertinent questions." There appeared to be only two notations on the questionnaire, both informational. One prints the name EVANS under Mr. Evans signature. The other prints Mr. Evans street address under his answer to question 1, which asks for, among other things, his present address. Mr. Evans had omitted the name of the street, but not the number. In all other respects, this application form is completed correctly. At the top of page three there is the notation, "QUESTION - NO."

September 16, 1963

1. After filling out his application form Mr. Evans was asked who represents him in Washington. He had no answer (UT 412).
2. Mr. Evans received a notice of rejection stating that he had "failed to answer correctly one or more pertinent questions." There is apparently only one notation on the questionnaire,

the printed name of the street under
Mr. Evans written address in question 1.
The questionnaire is completed correctly.
At the top of page 3 is a notation,
"QUESTIONS - NO."

January 27, 1964

1. There were no oral questions asked at this time (UT 412).
2. Mr. Evans was sent a notice of rejection stating that he had "failed to answer correctly one or more pertinent questions." On the written insert question, there is a circle around Mr. Evans answer to the question, how many members of the federal House of Representatives are currently accredited to the State of Alabama. He had answered six. To the question, why, he had answered, because of redistricting. There is a question mark written beside that last answer.

May 18, 1964

1. Again, there appear to have been no oral questions. Upon this occasion Mr. Evans was given a new form of application with the insert part three III (4). He was asked to read a section of the constitution.

2. There appears to be no notation in Part I of the application; the only error is that Mr. Evans listed his precinct, ward, and district rather than his length of residence in the precinct, ward, or district. Part II, question 11 asks, "have you previously applied for and been denied registration as a voter? If so, when and where?" The word "when" has been circled; Mr. Evans' answer to that question was, "Four times previous to this time, Dallas County, Alabama." There appear to be no notations on Part 2 of this application. Mr. Evans answered correctly the four questions in Insert Part III. In the spelling test, Mr. Evans put down "appelat," "counter-fieting," and "comproision" for, respectively, appellate, counterfeiting, and composition. He spelled apportionment and manner correctly. On the dictation test, Mr. Evans read, "That a member of either of the state or United States legislatures should take oath before take office." There is an X on one side and a question mark on the other side of this dictation answer.

July 20, 1964:

1. This time Mr. Evans completed an application with Insert Part III(7).

2. The Board sent Mr. Evans a notification of rejection, stating that he had failed to answer correctly one or more pertinent questions." On Part I of the questionnaire there is written Mr. Evans' street address following his own writing of the street address. There is a circle around Mr. Evans' answer to the question concerning the highest grade of school completed; he had written 9th. In addition to the circle, there is a question mark above this answer. On Part II of the questionnaire the only notation appears to be concerning Mr. Evans' answer to question 16, which asks whether the applicant has ever seen a copy of the registration application form before receiving the copy he is using. Mr. Evans answered no, which answer was circled; there is a notation underneath the circle "affetive May 1964." There is an arrow leading from this comment to Mr. Evans' reply to another question in which he stated that he had applied for and been denied registration as a voter on May 18, 1964. In other respects, Mr. Evans completed Parts I and II of the application correctly. Mr. Evans answered correctly three of four questions in the Insert, missing the true or false question

concerning freedom of religion. There is a circle around that question. There are ten circles around words in the section, Excerpts from the Constitution; excerpts, judicial, construed, extend, equity, prosecuted, delegated, establishment, construed, prejudice. Mr. Evans did not spell correctly any of the five words given on the spelling test: seizures, infringed, impartial, prohibited, and despotism. Mr. Evans wrote as his understanding of the Tenth Amendment, "all powers are delegated to the United States by the Constitution and also to the states and for the people." Following this interpretation appears the notation, "No."

Summary
of the
Testimony and Applications
of
LOUISE JOHNSON FOWLKES
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
October 21, 1963	Rejected	B 285
March 2, 1964	Rejected	B 538
June 15, 1964	Rejected	B 587

Facts Showing Qualifications

Age: Each of her applications indicate that she was born August 12, 1940.

Residence: Each of her applications show her to be a resident of Dallas County. She has lived in Dallas County 23 years (UT 562).

Character: Each of her applications shows that she has not been convicted of a crime and that she is otherwise of good character.

Loyalty: On each of her three applications she swore under oath to support and defend the State and Federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or Federal government by unlawful means. She also affirmed her loyalty by her responses on two of her applications.

Ability to Read and Write: All of her applications show that she completed high school. She is a secretary by occupation (UT 561). She has filled out all her applications responsively and legibly.

Registration Experiences

October 21, 1963:

1. She was not asked any oral questions (UT 562).
2. She was sent a notice of rejection which indicated as the reason that she had "failed to answer correctly one or more pertinent questions." There is no specific indication on her application form as to the reason for the rejection; but on the third page is the notation: "QUESTIONS-NO." Also Question 6(b), on the first page, is circled; she omitted the length of time she had been a resident of her precinct. Question 21(a) is also circled; it relates to the priority of the duties and obligations of citizenship over those owed to secular organizations (B 285).

March 2, 1964:

1. She took a spelling test (UT 562).
2. She was sent a notice of rejection indicating that she had "failed to answer one or more pertinent questions." There is no specific indication on the application form as to the reason for the rejection. The

first two pages of the application form are completed correctly. One of the government questions on Insert Part III asks "what is the lawmaking body of the United States called?" The response "Constitution" is circled. In the excerpts from the Constitution, nine words are circled. On the dictation portion of the Insert the following is written: "Thibhanted" ("INHABITANT" is printed below the writing), "enorucution" ("ENUMERATION" is printed below the writing), "Legislature", "incampable" ("INCOMPATIBLE" is printed below the writing), and "authorized" ("AUTHORIZED" is printed below the writing and "OK?" is also printed below the writing with an arrow pointing toward the written word "authorized"). (B 538).

June 15, 1964:

1. She was asked to read and to explain an excerpt from the constitution (UT 563).
2. She was sent a notice of rejection which said "You failed to answer correctly one or more pertinent questions." There is no specific indication on her application form as to the reason for the rejection. The first two pages of the application form are completed correctly. The four questions on government in Insert Part III are answered

correctly. The number "1" opposite the first constitutional excerpt is circled. The words "apportioned" and "serving" are circled in the second and third excerpts respectively. Below the excerpts appears the following handwritten sentence: "There can not be any search or seizures of any thing unless there is a warrant issued describe the place to be search and the person or thing to be seized". A circle appears in the margin opposite the sentence. Mrs. Fowlkes read the first constitutional excerpt and her explanation of the excerpt is as follows:

Answer, there can not be any search of or seizure of any thing unless there is a warrant issued describe the place to be search and the person or thing to be seized. (Pl. Ex. 6-B-587)

On the section of Part III used for writing words from dictation the following are written and circled: "Counsels", "Misdemendors," "Concurance," "desceptating."

Summary
of the
Testimony and Application
of
CORDIE S. GARDNER
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
April 1, 1963	Rejected	B-30

Facts Showing Qualifications

Age: Her application indicates that she became a bona fide resident of the State of Alabama at birth and that her residency in Dallas County commenced in 1920. The form thus indicates clearly that she was above the legal voting age. She testified that she was 66 years old (UT 232).

Residence: Her application form shows her to be a lifetime resident of the State of Alabama and a resident since 1920 of the county and ward. She testified that she has lived in Dallas County more than 30 years (UT 232).

Character: Her application shows that she has not been convicted of any disqualifying crime and that she otherwise meets the character qualifications.

Loyalty: On her application form she swore under oath to support and defend the Constitution of the United States and the Constitution of the State of Alabama. She also by oath disavowed belief in and affiliation with any group which advocates the overthrow of the State or Federal governments by unlawful means. She further indicated her loyalty by stating in her responses on the form that she would practice and teach good citizenship.

Ability to Read and Write: Her application shows her to be a college graduate with experience as a teacher. The application is written legibly and responsively.

Registration Experiences

More than 10 years ago:

She filled out an application form and never heard from the Board (UT 233).

April 1, 1963:

1. She filled out the application form without receiving any instructions. She didn't recall being asked any oral questions, and she did not go into the back room of the office (UT 235).
2. She received a notice of rejection which said that her application had been denied because she "failed to answer one

or more pertinent questions." There are circles around "the date" and "present address" in question 1. Her response to question number one omitted those items. A note beside question 1 refers to question 7, where her address is given; the address is circled. There is a circle around "at birth," which was her answer to question, concerning residence. The words "CONSTITUTION: NO" are written at the top of the Oath page.

Summary
of the
Testimony and Application
of
STANLEY GARDNER
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
November 8, 1963	Rejected	B - 435

Facts Showing Qualifications

Age: Application shows he was born on March 6, 1930.

Residence: Application shows him to have resided in Dallas County since birth.

Character: His application shows he has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On his application he swore under oath to support and defend the State and federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or federal governments by unlawful means. He also affirmed his loyalty by responses to the question on his application.

Ability to Read and Write: His application shows him to be a high school graduate with six months of college training. He served two years on active duty in the U. S. Army. He is employed as a stock clerk.

Registration Experience

November 8, 1963:

1. He filled out his application in the presence of Mr. Atkins. He was then directed to the back room where he was asked to read, write, and explain a section of the Constitution (UT 567-568).
2. He was later sent a notice of rejection of which stated as grounds: "You failed to answer correctly one or more pertinent questions." On the application form a circle has been placed around 15(a): "Do you regard those duties and obligations you owe to any other secular organization when they are in conflict?" which has been answered, "No". He indicated to the Court that he did not understand the meaning of the word "secular." (UT 568)

An insert contains the following excerpt:

"RESERVED RIGHTS OF THE PEOPLE: The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people."

Under these words are the following instructions: "Please read aloud and then record in writing your understanding of the above."

His answer is: "That the rights of a person should not be disregarded by anyone or anytime."

Question number 20, concerning length of residence in State, county, and precinct has been left blank on the application form with the notation in the margin to "See No. 1." The answer to question number 1 gives the applicant's date of birth and also his place of birth (Dallas County). The applicant indicated to the Court that while filling out his form he was told by Mr. Atkins to hurry. He stated he was the last applicant to enter the registration office and completed his form shortly before 4:00 o'clock (UT 569). The form contains the notation "350 o'clock."

The applicant returned to the registration office at a later date in a subsequent effort to register but the office closed before he was able to enter (UT 567).

Summary
of the
Testimony and Applications
of
PETTUS GILFORD
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
Approximately 1954	Unknown	None
June 17, 1963	Rejected	B-92
October 31, 1963	Rejected	B-391

Facts Showing Qualifications

Age: Both Mr. Gilford's 1963 applications show that he was born August 13, 1916.

Residence: Both of his 1963 applications show Mr. Gilford to have been a resident of Alabama since 1916 and a resident of his county and ward or precinct since at least 1937.

Character: Both of Mr. Gilford's 1963 applications show that he has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each of his 1963 applications Mr. Gilford swore under oath to support and defend the State and Federal Constitutions and disavowed belief in, or

affiliation with, any group that advocates the overthrow of the State or federal governments by unlawful means. He also affirmed his loyalty by his responses to the other questions on both applications.

Ability to Read and Write: Both 1963 applications and Mr. Gilfords' testimony (UT 466) show that he finished high school. Mr. Gilford owns his own farm, consisting of forty-two acres (UT 467). He filled out the application legibly and responsively.

Registration Experiences

Approximately 1954:

In approximately 1954, Mr. Gilford filled an application form for registration, but never heard from the Board (UT 467).

June 17, 1963:

1. After Mr. Gilford had filled out his application form, he went into the back room and was asked some oral questions. To the question what is the meaning of the word "bona fide" he answered that it is proof you stayed in a place a limited time or someone can prove you had been there or something on that

order." (UT 468). To the question what is the meaning of the word "secular" he answered it had reference to the common every day things around us, that it had reference to "other church" or something on that order, and things either on or in the community (UT 469). To the question what is the "Constitution of Congress," Mr. Gilford replied "Did I understand you to say what is the Constitution of Congress?" The questioner bowed his head, and Mr. Gilford answered that he had never of it (UT 469).

Mr. Gilford later received notice of rejection indicating that he had "failed to answer correctly one or more pertinent questions." There is no specific indication on his application form as to the reason for the rejection. There is a question mark placed above Mr. Gilford's spelling of United States in question 20; his spelling is "Unistates." On the same question he spelled correctly such words as constitution, Alabama, obey and counties. There is a question mark within Mr. Gilford's

answer to question 7(a), where he gave the reason for having been denied registration before. He answered this question "did hear from the Board" and the question mark is placed between the words "did" and "hear". There is a notation at the top of page 3 of the application, "Questions - No."

October 31, 1963

1. After filling out his application, Mr. Gilford went into a back room and was asked oral questions. First, he was asked to read the Ninth Amendment of the Constitution, which he did. Then he was asked the meaning of the word; "enumeration;" his answer was that as near as he could think it had to do with numbers. He was asked another question, but could not remember at the time of the trial what that question was. He was then asked to explain as well as he could the meaning of the Ninth Amendment. His answer was that to him it had to do with the number of rights that might be denied to people in the state (UT 470, 471).
2. A notice of rejection was sent stating that Mr. Gilford had "failed to answer

correctly one or more pertinent questions."

On the application form there has been placed a question mark besides Mr. Gilfords answer to question 10(a). This question asked for the facts concerning denials of previous applications for registration. Mr. Gilfords' answer was "Do not no."

There appears to be no other notation on the questionnaire except a notation on the top of page three, "Question: - No."

Summary
of the
Testimony and Applications
of
MYRTLENE HALL
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
November 6, 1963	Rejected	B-415
March 2, 1964	Rejected	B-585

Facts Showing Qualifications

Age: Her application dated 6 November 1963 stated the instant date rather than her date of birth, but indicated she has been a resident of Dallas County since 11 October 1927. Her second application, 2 March 1964, gave her date of birth as 11 October 1927.

Residence: Both applications show her to have been a resident of State, county, and precinct for over thirty years.

Character: Both applications show that she has not been convicted of any disqualifying offense and otherwise meets the character requirements.

Loyalty: On both of her applications she swore to support and defend the State and federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or federal govern-

ments by unlawful means. She also affirmed her loyalty by her responses on both applications.

Ability to Read and Write: Both of her applications show her to be a high school graduate.

Registration Experiences

November 6, 1963

1. She filled out her application form at the registration office without apparent incident (UT 582, 583).
2. A notice of rejection was sent to her giving as a reason: "You failed to answer correctly one or more pertinent questions." Markings indicate that information concerning exact place and date of birth was not properly given. The question "Do you regard those duties and obligations as having priority over the duties and obligations you owe to any other secular organization when they are in conflict?" was answered "No." However, she indicated to the Court that she did not understand the meaning of the word "secular" (UT 586). Her written explanation of an excerpt from Article IX of the Constitution was as follows:

"I understand that this means the rights of everyone should not be denied. There are certain things and laws in the Constitution should not be changed for any one person or group for the benefit of anyone according to race color or creed."

March 2, 1964

1. She filled out her application form at the registration office after first getting a registered voter to vouch for her (UT 587).
2. A notice of rejection was sent her giving at the reason: "You failed to answer correctly one or more pertinent questions." Two of the five words dictated from the Constitution appear to be marked as incorrectly spelled, and in the excerpts from the Constitution circles have been drawn around the words "requisite," "Numerous," "senators," and "affirmation." In answer to the question: "What is the lawmaking body of the United States called?" she has written "House of Representatives," which has been circled. The other three questions in the same section are correct.

February, 1964

In February, 1964, she attempted to register to vote but was unable to do so because she did not have a registered voter as a voucher. She left the office, returned with a qualified voucher, but was unable to get back into the office to register (UT 584).

Summary
of the
Testimony and Application
of
LUCINDA HARRELL

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
July 5, 1963	Rejected	B-116

Facts Showing Qualifications

Age: Her application indicates that she was born on February 25, 1940, and was over 21 at the time of her application.

Residence: Her application shows her to be a resident of Dallas County and to have resided in this county since birth.

Character: Her application shows that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On her application she swore under oath to support and defend the State and Federal Constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or Federal governments by unlawful means. She also affirmed her loyalty by her responses on the application.

Ability to read and Write: Her application shows her to be a high school graduate and to have had one year training in nursing school. She is a licensed practical nurse (UT 394). She filled out her application form responsively and legibly.

Registration Experience:

July 5, 1963:

1. After she filled out her application form, she was asked to go into the back room (UT 394). In the back room she was asked to identify the head of the Executive Department, and to name three duties of the President (UT 395.) She responded that the President of the United States was the head of the Executive Department and named two duties of the President-veto power and enforcement of the laws. She told the person who orally questioned her -(she does not know him and was unable to identify him in the courtroom) -that she could not think of any more duties of the President at that time. He told her to think hard and make sure; that she looked like an intelligent person, and he did not want her to get confused. He asked her if he was being fair and she said, "As far as I know, I guess so." (UT 395).

2. She later received a notice of rejection which indicated as the reason that she had "failed to answer correctly one or more pertinent questions." There is no specific indication on her application form as to the reason for the rejection; but one question is circled on the second page, on the second page is the notation "Question 16(b) was circled. She omitted the name of her precinct and the date upon which which she became a bona fide resident of the precinct.

Summary
of the
Testimony and Applications
of
GEORGIA HENLEY
(Negro)

Applications Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
June 3, 1963	Rejected	B-76
August 19, 1963	Rejected	B-177
November 18, 1963	Rejected	B-444
April 20, 1964	Rejected	B-561
July 8, 1964	Rejected	B-629

Facts Showing Qualifications

Age: Three of her applications indicate that she was born on December 25, 1939, and two indicate her date of birth as December 25, 1938. In any case she was over 21 each time she applied.

Residence: Each of her applications show her to be a resident of Dallas County and to have resided in this county since birth. She has lived in Selma ten years (UT 174).

Character: Each of her applications shows that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each of her five applications she swore under oath to support and defend the State and federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or federal governments by unlawful means. She also affirmed her loyalty by her responses on each of her applications.

Ability to Read and Write: All of her applications show her to be a high school graduate. She is a clerk-typist by occupation (UT 174). She has filled out all five application forms responsively and legibly.

Registration Experiences

June 3, 1961:

1. She filled out her application form in the front room of the registration office in the presence of Mr. Atkins. She then waited there until Mr. Atkins told her to go into the back room (UT 175). In the back room Colonel Bibb asked her oral questions (UT 175). She does not remember what the questions were. Colonel Bibb looked over her application form carefully. He did not call to her attention any errors or omissions in her application form (UT 176).

2. She later received a notice of rejection which indicated that she had "failed to answer correctly one or more pertinent questions." There is no specific indication on her application form as to the reason for the rejection; but one question is circled on the first page, another on the second page, and on the third page is the notation: "QUESTION NOT NECESSARY." Question 3(a) is circled. It relates to the priority of the duties and obligations of citizenship over those owed to secular organizations. She answered "no." Question 3(b) is also circled. She omitted the date upon which she became a bona fide resident of her precinct.

August 19, 1963

1. She filled out another application and when she went to the back room this time she was asked orally "Who is the Vice President?" She answered "Lyndon Baines Johnson." (UT 178). The registrar also asked her to name one duty of the President. She told him that one of the President's duties is to enforce the law. (UT 179). She was not asked the duties of the Vice President; who was in charge of the Executive Division of the Federal Government; or what powers the Constitution reserves to the state of Alabama or its people (UT 178, 79).

2. She was sent a notice of rejection which said, "You failed to answer correctly one or more pertinent questions." On this application there is a circle marking question 15(b) in which she omitted the date of residence in her precinct. In all other respects this application is completed perfectly. On the top of page three of her application is a note which says, "Questions-No."

November 18, 1963

1. On one occasion she had to wait all day before getting in to register. She does not recall if it was this time, but she does remember that she was given a number on November 18, 1963 (UT 180). When she got into the back room she was given a sheet of paper with the Ninth Amendment typed on it. The registrar told her to give her definition of the Amendment. She told him that it was the Ninth Amendment, that it expressed itself, and that she did not understand what he wanted her to do. The registrar told her to write "Do not understand" on the form (UT 180, 21).
2. The registration records do not contain a notice of rejection for this application. There are no questions marked on the application and the application contains no errors

or omissions. Attached to the application is a lettersized sheet with the Ninth Amendment typed on it and the sentence "Please read aloud and then record in writing your understanding of the above." Underneath this are written the words, "Do Not Understand."

April 20, 1964

1. After she filled out her application the registrar did not say anything to her about it and did not call to her attention any errors or omissions (UT 135). She was asked to read aloud an excerpt of the Constitution. She had no difficulty with the reading (UT 132). She was also required to write words dictated to her by the registrar (UT 132, 23). In addition she had to answer four written questions on Government.
2. She was sent a notice of rejection which said "You failed to answer correctly one or more pertinent questions." On her application form there is a circle around question 3 in which she gave her date of birth in answer to: "If you are a naturalized citizen give number appearing on your naturalization papers and date of issuance." In answer to question she stated that she had previously applied for and been denied registration as

a voter in November, 1963. A note in the margin says "4 Times." In the "Insert Part III" section of the application she answered all four questions on government correctly. In the excerpts from the Constitution, the words "excerpts" and "sufficient" are circled, although she correctly read aloud in full to the court the entire Constitutional passage in which the latter word is contained (UT 185), which passage is:

The ratification of the conventions of nine states shall be sufficient for the establishment of this constitution between the states so ratifying the same.

In the space for writing from dictation she wrote correctly the following words:

"Affirmation," "tranquillity" (Someone has printed "TRANQUILLITY" underneath), "expiration," "qualification" and "establish."

July 8, 1964

1. After she filled out her form, the registrar did not call to her attention any errors or omissions (UT 185). She was required to answer four questions on government. She was also required to write from dictation the words "endorsing," "impartial," "despotism", "infringed", and "seizures." She could not

understand the registrar plainly. She repeated the words and he told her "that's right." He only called out the words once. She did not understand what he meant when he pronounced "Seizures." (UT 132, 33)

2. She was sent a notice of rejection which said "You failed to answer correctly one or more pertinent questions." There is a circle marking question 3 in which she gave her date of birth. In question 11 she put May, 1964 and there is a note in the margin which says "APRIL 20." Three of the four questions on government are marked with a circle. Apart from questions 2 and 4 which are incorrect, one of those marked is question 1 -- "What is the lawmaking body of the United States called?" --to which she answered "Legislature." There is a note in the excerpt part which reads "WRITE YOUR UNDERSTANDING OF NO. 4" The fourth excerpt is:

The congress shall have power to dispose of and make all needful rules and regulations respecting the territory or other property belonging to the United States; and nothing in this constitution shall be so construed as to prejudice any claims of the United States, or of any particular State.

Her interpretation was, "Congress have the power to dispose of property belonging to the United States." A circle was placed in the margin near her answer.

On the dictation part of the form she has written: "Seausers" (this is circled and "SEIZURES" is printed below), "Infrenge" (the "e" is circled and an "i" is written in above), "Impartial," "Intoxicating," and "despertism" (this is circled and "DESPOTISM" is printed above.) When asked to spell "seizures" for the Court she spelled it correctly (UT 183).

Summary
of the
Testimony and Application
of
EVA HINES
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
April 1, 1963	Rejected	B-34
June 17, 1963	Rejected	B-95
November 18, 1963	Rejected	B-447
April 20, 1964	Rejected	B-562A

Facts Showing Qualifications

Age: Each of her four application forms indicates that she was born on March 9, 1941. She was over 21 each time she applied.

Residence: Each of her applications shows her to be a resident of Dallas County and to have resided in the county for approximately 10 years.

Character: Each of her applications shows that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each of her four application forms she swore under oath to support and defend the State and federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow

of the State or federal government by unlawful means.

Ability to Read and Write: Her applications indicate that she has spent two years in college. She has filled out all four application forms responsively and legibly.

Registration Experience

April 1, 1963

1. She filled out her application form in the front room of the registration office. She was then directed into the back room, where she was asked some oral questions (UT 385). She was asked to define the Constitution and answered that it was a "group of fundamental laws ... by which a group of people or nations or counties were governed" (UT 386). She was also asked to state the duties of the three branches of government which she had named in response to a prior question (UT 387). She replied that, "the Legislature Department makes the laws; the Executive enforces them, the laws, and the Judicial Department executes the laws" (UT 387).
2. She was sent a notice of rejection which stated, "You have failed to answer correctly one or more pertinent questions". There are no questions marked on the application; it contains no errors or omissions. Above

the oath section are written the words,
"Constitution No."

June 17, 1963

1. She filled out an application form and was directed to the back room where she was asked oral questions (UT 388). She was asked the meaning of the word, "bona fide" and replied that it meant "in good faith" (UT 388). She did not definitely recall the other questions she was asked.
2. She was sent a notice of rejection which stated, "You have failed to answer correctly one or more questions." On this application form there are no circles or other marks indicating an incorrect or omitted answer. In all respects the application is completed perfectly. Above the oath section are written the words, "Questions-No."

November 18, 1963

1. She filled out another application form and was asked to read orally the Ninth Amendment to the Constitution and to give a written explanation of it (UT 389). Part of her interpretation was that "the rights of individuals shall not be denied."
2. She was sent a notice of rejection which said that she had "failed to answer correctly one or more pertinent questions" (UT 390).

On this application is a circle marking question 9, in which she omitted a statement of the extent of her education and business experience, but instead filled the spaces with horizontal lines. In all other respects this application is completed correctly.

April 20, 1964

1. After she filled out her form, she was required to answer four questions on government. She responded in writing that there were 13 stars in the United States Flag and that Congress is the lawmaking body of Alabama. Both of these answers are circled.
2. She later received notice of rejection which stated, "You failed to answer correctly one or more pertinent questions." In the section of the application from which she was required to read, the words "excerpts", "construed" and "prejudice" are circled. She had written five words from dictation. The word "tranquillity" is written under her answer of "Transquility". She failed to sign her name to the oath provided at the beginning of "Part II"; a circled check mark indicates the omission. There are question marks beside questions two and three of Part II. Question 2 asks for

the applicant's birthplace; she answered,
"Perry County - Uniontown, Alabama."

On question 3, the applicant had written
her birth date in a space provided for
the number of her naturalization papers,
if any.

Summary
of the
Testimony and Application
of
ANNIE HOGAN
(Negro)

Application Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No.</u>
July 9, 1964	Rejected	B-644

Facts Showing Qualifications

Age: Born October 30, 1899

Residence: Selma, Dallas County, Alabama for over
50 years.

Character; She has not been convicted or fined for
any violation of law, according to her
application.

Loyalty: On her application form she swore under
oath to defend the Constitutions of the
U. S. and the State of Alabama and that
she did not believe in or have affiliation
with any organization advocating overthrow
of the government of the United States or
the government of the State of Alabama by
unlawful means.

Ability to Read and Write: She has a college education
(B. S. degree) and was a school teacher
for 34 years (UT 536).

Registration Experiences

She has attempted unsuccessfully to register some 8 or 9 times. She received no word about the results of the applications made prior to July 9, 1964.

July 9, 1964

1. Made application before Mr. Atkins. Along with the written application she was asked to spell some words, to read something from the Constitution, and to explain one of the sections of the Constitution (UT 537). She read to the Court without difficulty one of the excerpts from the Constitution appearing on her application form.
2. She was notified that her application had been rejected. Reason given: "You failed to answer correctly one or more pertinent questions." Two questions on the application form are circled. One of these is answered incorrectly; the other one "What is the lawmaking body of the United States called? She interpreted the constitutional provision concerning federal territory as follows:

"I understand by article No. 4 that Congress has the power to get rid of or divide or do anything that it thinks best for the U. S. concerning the territory of the U. S. and that the Constitution was established to form a more perfect union, establish peace and justice for all. Prepare for the common defence of all and to be sure that everyone has liberty and justice at home and abroad."

A question mark was placed alongside this explanation by someone other than the applicant (UT 538). There are no other indications of omissions or incorrect answers on the applications.

Summary
of the
Testimony and Applications
of
MATTHEW JACKSON, SR.
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
May 7, 1962	Rejected	B-1
March 4, 1963	Rejected	B-15
May 20, 1963	Rejected	B-56
August 5, 1963	Rejected	B-142
October 25, 1963	Rejected	B-341
January 20, 1964	Rejected	B-484
April 6, 1964	Rejected	B-545
June 15, 1964	Rejected	B-586

Facts Showing Qualifications

Age: His application shows that he was born August 31, 1906.

Residence: His applications show him to be a resident of Dallas County, State of Alabama, since March 20, 1913, and of Precinct 36 since 1920.

Character: Each of his applications shows that he has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each of his eight applications he swore under oath to support and defend the State

and federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or federal governments by unlawful means. He also affirmed his loyalty by his responses on each of his applications.

Ability to Read and Write: All of the eight applications show him to have two years of college. He is a minister by occupation.

Registration Experiences

1. He made eight applications between May 7, 1962 and June 15, 1964. Included in his applications were oral examinations (UT 548-49).

One application was rejected on the grounds that he had a police record; he took the matter up with Mr. Atkins. After some difficulty the applicant was able to establish that he did not have a police record (UT 549-50).

2. His application of May 7, 1962 has no indications of errors or omissions except the handwritten notation, "No understanding of U. S. Constitution," with the initials "JRB." Below this is the notation, "See Police Record - Also." Mr. Jackson was notified that his application had been rejected on grounds that "You have failed to answer one or more pertinent question."

Mr. Jackson's application dated March 4, 1963, contains a circle around one word used to answer question 10 concerning the duties and obligations of citizenship and the handwritten notations: "Constitution: NO." There are no other indications of errors or omissions. He was later informed that his application had been rejected on the grounds that he had "failed to answer one or more pertinent question," also "False oath."

Mr. Jackson's application of May 20, 1963 was marked only with the words, "Questions - NO." This application was rejected on the grounds "You have failed to answer one or more pertinent questions," with the additional comment "Police Record" initialed "JRB."

Mr. Jackson's application dated August 5, 1963, has no indications of errors or omissions and was rejected on the grounds "You failed to answer correctly one or more pertinent questions."

Mr. Jackson's application dated October 25, 1963, contains no indications of errors or omissions except the notation "No questions." This application was rejected on the grounds that "You failed to answer correctly one or more pertinent questions."

Mr. Jackson's application dated January 20, 1964, contains no indications of errors or omissions in the body of the form, but the following typewritten question has been added: "How many members of the Federal House of Representatives are currently accredited to the State of Alabama? Why?" The answer given is: "8. Because these men are the law make from Alabama. Two Senators." This insert is signed by the applicant but the date is left blank. A question mark has been placed next to the answer. This application was also rejected on the grounds, "You failed to answer correctly one or more pertinent questions."

Mr. Jackson's application dated April 6, 1964, is marked to indicate that information regarding the time and place of previous registration applications and addresses of vouchers for residence has been omitted. The answer, "Dallas," to the question "In what town or city is the courthouse located in this county?" is circled. The answers to the three other questions in the same section, however, are apparently correct. In the excerpts from the Constitution the words "prejudice" and "quorum" are circled. The form indicates the applicant was asked to write down the words "tranquillity,"

"establish," "posterity," "citizen," and "qualification." Three of the words are incorrectly spelled and are encircled.

Mr. Jackson's application dated June 15, 1964, is marked to indicate the words dictated to the applicant which he spelled incorrectly, "misdemeanors," "discipline," and "privileged." Also, a notation has been made beside the applicant's correct spelling "behavior." In excerpts from the Constitution the words "apportioned," "treason," and "judicial" are circled, and the word "NO" is written alongside the applicant's explanation of one excerpt. The answer "Govern" to the question "What is the chief executive of Alabama called?" has a question mark next to it. The question, "Are post offices operated by the state or federal government?" is answered with the words "Federal government." The question, "What is the name of the president of the United States?" is answered "L. B. Johnson." The question "To what national lawmaking body does each state send senators and representatives?" is answered "To the Congress of the United States." This application was rejected on the grounds "You failed to answer correctly one or more pertinent questions."

Summary
of the
Testimony and Applications
of
JALLY SMITH JEFFERSON
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
July 5, 1963	Rejected	B-120
October 18, 1963	Rejected	B-276

Facts Showing Qualifications

Age: Both applications show Mrs. Jefferson (then Miss Smith) to have been born August 25, 1937, over twenty-one years prior to either time she applied.

Residence: Both applications of Mrs. Jefferson, as well as her testimony, show her to have been a resident of Selma since birth (UT 421).

Character: Each application shows that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On her first application, Mrs. Jefferson answered "yes" to the question, "Will you give aid and comfort to the enemies of the United States Government or the Government of the State of Alabama." At the

trial, Mrs. Jefferson testified that her answer had been a mistake (UT 427). In her second application, Mrs. Jefferson answered the same question correctly.

On both applications she swore to support and defend the Constitutions of the United States and of Alabama, disavowed any affiliation with a group seeking to overthrow the State or Federal government by unlawful means, and otherwise affirmed her loyalty.

Ability to Read and Write: Both applications show her to have three years of nurse training. She is a registered nurse and night supervisor at the Good Samaritan Hospital (UT 422). Mrs. Jefferson completed both application forms responsively and with excellent handwriting.

Registration Experiences

July 5, 1963:

1. Mrs. Jefferson completed the form in the Registrar's Office, then was called into a back room (UT 423). There she was asked no questions, but a man asked her to have a seat, looked over her application, and asked her to sign it (UT 423). He made no comment on any errors on the form.

2. She later received a rejection that stated she had "failed to answer correctly one or more pertinent questions." There is no specific indication on her application form as to the reason for the rejection. Question 12, relating to aid and comfort to the enemies of the Government, was circled. Mrs. Jefferson answered "yes."

October 1963:
(date uncertain)

Mrs. Jefferson made her second attempt to register in October 1963. She does not remember the date (UT 424). She waited in line three hours that day but never got in to register. There was a long line, and she was quite a distance from the Courthouse, across the alley from the Courthouse (UT 425).

October 12, 1963:

1. When Mrs. Jefferson was called into the back room after her second form had been completed, she was asked to raise her hand and be sworn in. There were two men in the back room; one administered the Oath to her and asked her one oral question. The question was, what was the law of the land; her answer was, the Constitution.

The questioner did not make any comment (UT 425, 26). The two men in the back room looked over Mrs. Jefferson's form again; one had her sign it and told her that she would be notified in a couple of weeks (UT 426).

2. She received a notice of rejection that stated she had "failed to answer one or more pertinent questions." There is no specific indication on her application form as to the reason for the rejection. No question is circled. Indeed, the answer to each question is responsive and adequate. On the top of page three of her application is a note which says, "Questions: No." This application is filled out perfectly.

Summary
of the
Testimony and Applications
of
WILLIA EDNA JOHNSON
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
May 20, 1963	Rejected	B-58
August 19, 1963	Rejected	B-180

Facts Showing Qualifications

Age: Her applications indicate that she was born on April 30, 1939, and was over 21 each time she applied.

Residence: Each of her applications shows her to have been a resident of Dallas County for the past 5 years.

Character: Each of her applications shows that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each of her applications she swore under oath to support and defend the State and Federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or Federal governments by unlawful means.

Ability to Read and Write: Each of her applications show her to have had 3 years of college.

She is a file clerk by occupation (UT 402).
She has filled out the application forms
responsively and legibly.

Registration Experiences

May 20, 1963

1. She filled out her application form in the front room of the registration office.
After she was requested to go to the back room, she swore to the oath and was asked oral questions (UT 403). She did swear to the oath, but she felt that she should only be required to answer written questions and did not answer the oral questions (UT 404, 405). She told the Registrar that she did not know the answers to the questions (UT 405).
2. She later received a notice of rejection which indicated as the reason that she had "failed to answer one or more pertinent questions." There is no specific indication on her application form as to the reason for the rejection; but question 11(b) is circled on the application form. She did not indicate in the answer to question 11(b) when she became a resident of her precinct.
Under question 21 and over the oath section, there is written "Question I don't know" (the latter three words are circled).

August 19, 1963

1. She filled out her application form in the front room of the registration office. After she was requested to go to the back room, she swore to the oath and was asked oral questions (UT 403). She did swear to the oath, but she felt that she should only be required to answer written questions. She did not answer the questions and told the registrar, "I don't know" (UT 405, 406).
2. She later received a notice of rejection which indicated as the reason that she had "failed to answer correctly one or more questions." There is no specific indication on her application as to the reason for the rejection; but question 19(b) is circled. She failed to indicate in question 19(b) when she became a bona fide resident of her precinct. At the end of the questions on the form and preceding the oath are the words, "Question -- 'I really don't know.'"

Summary
of the
Testimony and Application
of
OPHELIA EDWARDS JORDAN
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
August 17, 1964	Rejected	B-674 A

Facts Showing Qualifications

Age: Her application indicates that she was born on July 16, 1920, and thus was over 21 years of age when she applied.

Residence: Her application shows her to have been a resident of Dallas County for 40 years. She has lived in Selma for all of that time (UT 207).

Character: Her application shows that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On her application she swore under oath to support and defend the State and federal Constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or federal government by unlawful means.

said, "You failed to answer correctly one or more pertinent questions."

Question one of the four government questions, which is "What is the law-making body of Alabama called?" is circled and was answered incorrectly, "Senate". In the excerpt from the Constitution, the word "enumeration" is circled, although she correctly read aloud in full to the Court the entire Constitutional passage in which the latter word is contained, the Income Tax Amendment (UT 211). On the dictation part of the form she had written "inserection" (this is encircled and INSURRECTION is printed below). Her interpretation of the Constitutional provision concerning Presidential electors was:

"Each State is entitled to a certain number of representatives and electors, but no senator shall be appointed as an elector. This gives a true representative of each State."

A circle was placed in the margin near her answer.

Summary
of the
Testimony and Application
of
WILLIE MAE MARTIN
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
June 15, 1964	Rejected	B-589

Facts Showing Qualifications

Age: Her application shows her date of birth to be September 13, 1928.

Residence: Her application shows her to be a resident of Dallas County and to have resided in this county for twelve years.

Character: Her application shows that she has not been convicted of any disqualifying offense and otherwise meets the character requirements.

Loyalty: On her application she swore under oath to support and defend the State and Federal Constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or federal governments by unlawful means. She also affirmed her loyalty by her responses to questions.

Ability to Read and Write: Her application shows her to have a fifth grade education. She has filled out the application form responsively and legibly.

Registration Experience

June 15, 1964:

1. She filled out the application form and was then given some words to write down. She wrote down only one of the words dictated (UT 588, 589).
2. A notice was sent to her informing her that her application had been rejected because she had "failed to answer correctly one or more pertinent questions." Other than the words dictated, the only indication of errors marked on the application occur in the excerpts from the Constitution. In that section the words "secure," "affirmation," "apportioned," "aid," and "judicial," are circled. The word "NO" has been written by what is apparently an interpretation of one of the excerpts from the Constitution, "Shall not be violated Both support the Constitution."

In response to questions on the application she stated that the chief executive of Alabama is called the governor, that post offices are operated by the federal government, that the name of the President of the United States is Lyndon B. Johnson, and that the national lawmaking body to which each state sends senators and representatives is Congress.

Summary
of the
Testimony and Application
of
CHARLES S. MAXEY
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
August 17, 1963	Rejected	B-183

Facts Showing Qualifications

Age: His application shows that he was born on December 16, 1934.

Residence: His application shows him to be a resident of Dallas County and to have been a resident of this county since birth.

Character: His application shows that he has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On his application he ~~swore~~ under oath to support and defend the State and Federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or Federal governments by unlawful means. He also affirmed his loyalty by his responses to questions on his application.

Ability to Read and Write: His application shows him to be a high school graduate. He filled out the application form responsively and legibly.

Registration Experience

August 19, 1963

1. He filled out the registration form and was then directed to the back room where he was asked the oral questions: "Who is the Vice President and President of the United States." (UT 559). He answered "President Kennedy and Vice President Johnson." (UT 560).
2. He later received a notice of rejection which indicated as the reason that he had "failed to answer correctly one or more pertinent questions." There is a circle marking question 2(b) in which he omitted the date of residence in his precinct. In all other respects this application is completed perfectly. On the top of page three of his application is a note which says, "Questions-No."

Summary
of the
Testimony and Applications
of
ROSA MAXEY
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
March 18, 1963	Rejected	B-23
June 17, 1963	Rejected	B-96
August 19, 1963	Rejected	B-184
November 18, 1963	Rejected	B-448
April 20, 1964	Accepted	A-80

Facts Showing Qualifications

Age: All five of her applications show her date of birth as January 19, 1936.

Residence: Each of her applications show her to be a resident of Dallas County and to have resided in this County since birth.

Character: Each of her applications shows that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each of her five applications she swore under oath to support and defend the State and federal constitution and disavowed belief in and affiliation with

any group which advocates the overthrow of the State or federal governments by unlawful means. She also affirmed her loyalty by her responses on each of her applications.

Ability to Read and Write: All of her applications show her to be a college graduate. She has been employed as a teacher, a hospital clerk, and as a mail reader.

Registration Experiences

1. She completed her application but does not remember if she was asked any oral questions (UT 542).
2. A notice was sent informing her that her application had been rejected because "You have failed to answer correctly one or more pertinent questions." On this application there is a circle marking question 12(b) in which she omitted the date of residence in her precinct. In all other respects this application is completed perfectly. On the top of page three of her application is a note which says, "Constitution - NO."

June 17, 1963:

1. She filled out the application form but does not remember if she answered any oral questions (UT 542).

2. A notice was sent informing her that her application had been rejected for failure to "answer correctly one or more pertinent questions." Her application form reveals no indication of errors or omissions. In all respects it had been completed perfectly. On the top of page three of her application is a note which says, "Questions - No."

August 19, 1963

1. She filled out the application form but does not remember being asked any oral questions (UT 543).
2. She was sent a notice informing her that her application was rejected for failure "to answer correctly one or more pertinent questions." Her application form has been perfectly completed and contains no indication of errors or omissions. At the top of page three there is a note which says, "Questions: No."

November 18, 1963

1. She filled out her application form and then answered a question typewritten on a separate sheet of paper.
2. She was notified that her application had been rejected for failure "to answer correctly one or more pertinent questions."

Her application form has been perfectly completed and contains no indication of errors or omissions. On the separate sheet she explained Article IX of the Constitution in the following words:

"According to the statement above this means that rights given to people cannot be taken from said people or in any way taken in a way to prevent people from attaining their rights as citizens.

"So far as the Constitution is concerned, it so states that each individual rights are concerned. That is the fundamental laws that govern us."

There is no mark on the separate sheet or on any page of her application form that indicates that the above statement is incorrect.

April 20, 1964:

1. This application was accepted. In the excerpts from the Constitution the words "conventions" and "quorum" are circled. She had no difficulty in reading these words to the Court (UT 544-545). The words "affirmation," "tranquility," "impeachment," "expiration," and "posterity" are written out under "tranquility" someone has printed "tranquility." In all other respects her application form has been perfectly completed.

are spelled correctly; under "tran-
quility" someone has printed
"tranquillity." To question 11,
concerning prior applications, she
replied by giving one date. Colonel
Bibb's initials appear with a comment,
"About 5 times."

Summary
of the
Testimony and Applications
of
AMELIA MARTIN MITCHELL
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
August 5, 1963	Rejected	B-150
November 6, 1963	Rejected	B-416

Facts Showing Qualifications

Age: Each of her applications show her date of birth to be February 1, 1931.

Residence: Each of her applications show her to have been a resident of Dallas County since 1933.

Character: Each of her applications shows that she has not been convicted of any disqualifying crime and otherwise meets the character qualification.

Loyalty: On each of her applications she swore to support and defend the State and federal constitution and disavowed belief in and affiliation with any group which advocates the overthrow of the State or federal governments by unlawful means. She also affirmed her loyalty by her responses on each application.

Ability to Read and Write: Each of her applications shows that she is a college graduate. She is a Bible teacher by occupation. She filled out each application form responsively and legibly.

Registration Experience

1. She filled out her application form at the registration office without assistance, but noticed a white man being assisted with his form (UT 256). She was then directed to the back room where she was questioned orally. She was asked the duties of the President, and replied by saying he executed all laws (UT 256). She was also asked a question that she could not later recall with any exactness. She remembered, however, that her answer was Attorney General Robert Kennedy. She told the Court that Attorney General Robert Kennedy was in charge of the Justice Department (UT 257).
2. She received notice that her application had been rejected for failure "to answer correctly one or more pertinent questions." Her application form has a circle around question number 20(b) in which she omitted the date of her residence in her precinct. In all other respects her application form is complete and correct. On the top of page three is a note which says, "Questions - No."

November 6, 1963:

1. She arrived at the registration office at 6:30 a.m. and waited until 11:30 a.m. to be admitted. The previous day she had waited from 2:30 p.m. until about 4:00 p.m. without being admitted. She filled out her form without assistance and was given an insert with a written question on it (UT 259).
2. She was never notified of any action that was taken on her application (UT 260). There is a circle on her application at question 9(b) in which she omitted to give the date of her residence in her precinct. On the insert she has explained the Ninth Amendment of the Constitution in the following words: "This article means that the rights of people should not be denied or turned around to mean something else, and that these rights are guaranteed to us by the Constitution of the United States." At the bottom of the page someone has written the word, "No." She read the same excerpt from the Constitution and her explanation to the Court without difficulty (UT 260). In every other respect her application form is complete and correct.

Summary
of the
Testimony and Applications
of
MARGARET JONES MOORE
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
5 or 6 times before 1963	Unknown	None
July 3, 1963	Rejected	B-109
December 10, 1963	Rejected	B-463
July 9, 1964	Accepted	A-92

Facts Showing Qualifications

Age: All three of the applications in evidence show that Mrs. Moore was born March 19, 1914.

Residence: Each application in evidence shows Mrs. Moore has been a resident of Alabama from birth. Her applications show that she has been a resident of Dallas County since at least 1921. None shows when she became a resident of her ward or precinct; however, all three applications show that she had been a resident for five years preceding her application. Her second application, which was rejected, showed that she had been a resident of her precinct for at least five years prior to her application.

Character: Each of her applications shows that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: Her answers to questions in the first two applications in evidence and her oath in the third application show Mrs. Moore to be a loyal citizen. There is a question mark beside her answer to question four in the first application. That question requires the applicant to name some of the duties and obligations of citizenship; Mrs. Moore's answer was "Loyalty, love, honor, obedience and goodness."

Ability to Read and Write: All of Mrs. Moore's applications that are in evidence show her to have completed four years of college at Talladega. Her first application in 1963, which was rejected, also shows her to have obtained a master degree in education from Alabama State and to have done night work at Talladega. Her second application of 1963, which was also rejected, shows her to have a master of education at Alabama State, and a summer each at Talladega and Denver University. Her 1964 application, which was accepted, does not show her graduate work. Her testimony shows that Mrs. Moore has an A.B. in history and a degree in

education in library science and English. She is a teacher at the R. B. Hutchison High School; at the time of the trial, she had taught about twelve years in the system (UT 488).

Registration Experiences

Prior to 1963:

Beginning in the last part of 1953, or early 1954, Mrs. Moore applied to register five or six times. She did not hear from the board as to the action on any of those applications (UT 489).

July 3, 1963:

1. After filling out her application form, Mrs. Moore was asked some oral questions. She believed that she was asked the duties of the President and answered, "to look after his subjects, first in light of the Federal Government, then in the states, and then of its people in large" (UT 491). She was asked why she wanted to vote and answered that she was teaching 150 boys and girls, and they were asking her if she were a registered voter. She said it was embarrassing to say no, since she was to them a first class citizen (UT 492).
2. Mrs. Moore was sent a notice of rejection stating she had "Failed to answer correctly one or more pertinent questions." The words

"present address" in the first question were circled. That question required that the applicant state his name, date, place of birth, and his present address. Mrs. Moore had omitted her present address. Someone with the initials of Colonel Bibb had written her address in. As previously noted in this summary, under the consideration of Mrs. Moore's loyalty, a question mark was placed beside her answer to the question requiring the applicant to name some of the duties and obligations of citizenship. Questions 8 and 8(a) are circled. This question asks for the nature of the applicant's employment. Question 9(b), which asks when the applicant became a resident of his ward or precinct, has been circled. As noted, in the discussion of residence above, Mrs. Moore did not in this question put the date on which she became a resident of her ward or precinct, but she stated in another question that she has not moved for five years. Question 11 is circled. It asked whether the applicant has been previously denied registration as a voter, and Mrs. Moore did not answer that question. In other respects, Mrs. Moore's application is adequate. At the top of page three is the notation, "Questions - No."

December 10, 1963:

1. After filling out her application, Mrs. Moore was asked to read the Ninth Amendment to the federal Constitution. She repeated this task in court (UT 492). To the question, why did she wish to register to vote, Mrs. Moore answered that it was her understanding that Amendments 13, 14, and 15 of the Constitution gave her the right to be a first-class citizen and that the Twentieth Amendment gave her the right to vote as a woman. (UT 492).
2. Mrs. Moore was sent a notice of rejection for the reason that she had "failed to answer correctly one or more pertinent questions." (Question 19(b), which asks when Mrs. Moore became a resident of her ward or precinct, is circled; she did not put a date in that answer. Mrs. Moore had said on her application (Question 17) that she had lived at one address for the last five years. There are three question marks placed under Mrs. Moore's answer to Question 21, which asks whether she had previously applied for and been denied registration as a voter and if so what were the facts. Her answer was, "I applied July 3, 1963, but never heard from it. (1953 - 1954 - 60 & 61)." Plaintiff's Exhibit No. 6, B-109, shows that

a letter to Mrs. Moore postmarked July 16, 1963, was returned to the Board of Registrars for a better address. The address written on the application of July 1963 was 414 Broad rather than 1414 Broad.

There is no notation at the top of page 3 of the application of December 1963.

July 9, 1964:

1. After filling out her application form, Mrs. Moore was asked to read an excerpt from the Constitution and to spell five words, "impartial", "prohibited", "intoxicating", "ratification", and "deriving". The man who asked her to read from the Constitution told Mrs. Moore that she read very well and spelled very well; he said that she was one of the few people who spelled all five of the words that he called (UT 493).
2. This time, Mrs. Moore's application was accepted. She did not answer the question whether she had ever been registered to vote in any other state or county. She did not answer the question asking for length of residence in her ward or precinct or district. Her answer to question 11 of Part 2 of the application is blurred, the word "no" apparently having been written over the word "yes"; there is a notation in the margin, "Yes?" Mrs. Moore did not state

when and where she had been denied registration as a voter. In the insert Part 3 there is written the comment, "Good reader," beside the excerpts from the Constitution.

Summary
of the
Testimony and Application
of
SOPHRONIA ELIZABETH MOSS
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
August 17, 1964	Rejected	B-676 A

Facts Showing Qualifications

Age: Her application indicates that she was born on July 24, 1912 and well within the age requirement.

Residence: Her application form shows that she has resided in Dallas County for 52 years.

Character: Her application shows that she has not been convicted of a disqualifying crime. Her answer to Question 17 states that she has been convicted only of a traffic violation.

Loyalty: On her application she swore under oath to support and defend the state and federal constitutions and disavowed belief in and affiliation with any group which advocates overthrow of the State and Federal governments by unlawful means.

Ability to Read and Write:

Her application shows that she has four years of college and is employed as a school teacher. She filled out the form responsively and legibly.

Registration Experience

August 17, 1964:

1. There is not testimony from the witness regarding her registration attempt.
2. She was sent a notice of rejection which said, "You failed to answer correctly one or more pertinent questions." There are no marks by the registrar on the first two pages of the form. On page three, Insert III (8), there is a circle around the word "city" in the question "What City is the capital of the United States?" There is also a question mark in the margin beside this question. The applicant answered that question "District of Columbia". There is a circle under the applicant's interpretation of the excerpt from the Constitution concerning Presidential electors. The applicant's interpretation was as follows:

1. That each state electors have a certain date to meet and vote

- for president of the United States.
2. That Congress is in power to collect taxes an income from regardless of the source without appartionment regardless of census.
 3. Each state has the power given to the legislature of that state.
 4. That all bills must be presented to the president of the United States to be signed or returned to the house."

She wrote the word "insurrection" as one of the five words dictated to her from the constitution. She spelled it as follows "insurectusion". There is a check mark above this word with a circle drawn around it. She spelled correctly these words: succession, affirmation, seize, and rebellion.

Summary
of the
Testimony and Applications
of
MARY FULLER PEEPLES
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
February 18, 1963	Rejected	B-7
December 16, 1963	Rejected	B-465

Facts Showing Qualifications

Age: Both of her applications indicate that she was born on July 29, 1932, and that she was over 21 each time she applied.

Residence: Each of her applications shows her to have been a resident of Dallas County for at least 10 years.

Character: Each of her applications shows that she has not been convicted of any disqualifying crime and that she otherwise meets the character qualifications.

Loyalty: On each of her applications she swore under oath to support and defend the State and Federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or Federal governments by unlawful means.

Ability to Read and Write: Each of her applications shows her to be a high school graduate and indicates that she attended college. She is a file clerk by occupation (UT 344). She has filled out all five application forms responsively and legibly.

Registration Experience

February 18, 1963

1. She filled out her application in the front room of the registration office. She was then asked to go to the back room where she took the oath and was asked an oral question (UT 345). She was asked "what is the Constitution of the United States?" to which she replied by repeating the Preamble from memory (UT 346). No Registrar called to her attention the fact that she had not answered the question on the form relating to her employment experience for the past five years (UT 350-351). She did not answer the question because she did not believe that she had been employed in her present job for a period of five years. (UT 349).
2. She was sent a notice of rejection which said, "You have failed to answer correctly one or more pertinent questions." On her application, there are two marks underlining the part of

her answer on question 2 which says "laws of the City." The question calls for some of the duties and obligations of citizenship. Above the oath section, there is written "Constitution: No." In all other respect this application is completed perfectly.

December 16, 1963

1. She filled out another application form and was required to "read aloud" Article IX of the Constitution and to write her understanding of it. She explained in writing that "That the number of the rights shall not be denied or taken from people because they may not appear in the Constitution." The first three words of the above writing have been underlined and a question mark has been written over the words.
2. She was sent a notice of rejection which said, "You have failed to answer correctly one or more pertinent questions." On the application there is a circle marking question 2(b) in which she omitted the date upon which she became a resident of her precinct. On question 17 which corresponds to question 2 of her first application (discussed above), the words "of the City" are again underlined. In all other respects this application is completed perfectly.

Summary
of the
Testimony and Application
of
VERNICE T. POPE
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
July 5, 1963	Rejected	B-118

Facts Showing Qualifications

Age: Her application indicates that she was born on April 22, 1920, and that she was over 21 when she applied for registration.

Residence: Her application shows her to have been a resident of Dallas County for approximately 15 years.

Character: Her application indicates that she has not been convicted of disqualifying crime and otherwise meets the character qualifications.

Loyalty: On her application she swore under oath to support and defend the State and Federal Constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or Federal government by unlawful means.

Ability to Read and Write: Her application shows

her to be a college graduate with a B.S. degree and a school teacher for 15 years. She filled out her form responsively and legibly.

Registration Experience

July 5, 1963:

1. She filled out the application form in the front room of the registration office. She was asked if she "knew the executive head of one of the ... departments. She replied, "Mr. Kennedy" (UT 220). No other questions were asked of her.
2. She later received a notice of rejection which stated, "You failed to answer correctly one or more pertinent questions." There is no specific indication on her application form as to the reason for the rejection. There is a check at question 8, concerning employment, which she had left blank. Above the oath section on page 3, are written the words, "Questions - No."

Summary
of the
Testimony and Applications
of
SEBORN POWELL
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
June 3, 1963	Rejected	B - 83
August 5, 1963	Rejected	B - 158
November 4, 1963	Rejected	B - 401
January 6, 1964	Rejected	B - 478

Facts Showing Qualifications

Age: All four applications show his date of birth to be June 20, 1933.

Residence: Each of his applications show him to be a resident of Dallas County and to have resided in this county since birth.

Character: Each of his applications shows that he has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each of his four applications he swore under oath to support and defend the State and federal constitutions and disavowed any belief in or affiliations

with any group that advocates the overthrow of the governments by unlawful means. He also affirmed his loyalty by his responses on each of his applications.

Ability to Read and Write: All of his applications show him to be a high school graduate. He has filled out all four application forms responsively and legibly.

Registration Experiences:

June 3, 1963:

1. He filled out his application form at the registration office. He was told to wait and after some passage of time was taken to the back room. There Mr. Atkins asked him some questions orally. He was asked what form of government he preferred and answered, "Democratic form of Government" (UT 512). He was asked two other questions, one of which he answered (UT 512).
2. He later received a notice informing him his application had been rejected for failure to answer correctly one or more pertinent questions." His application form contains neither errors nor omissions. On the top of page three is a note, which says, "Question - No."

August 5, 1963

1. He filled out the application form and was then asked, "Who is the Executive Government of the United States of America and name three of his duties." (UT 513-514). He replied, President Kennedy, and three of his duties was to appoint the Cabinet, sign the bills and enforce the law" (UT 514). No further question were asked of him.
2. He was notified that his application had been rejected for failure to answer correctly one or more pertinent questions. His application form is complete in every respect and contains no indication of errors or omissions. At the top of page three is a note, which says, "Questions: No."

November 4, 1963

1. He filled out another application form and made inquiry about his previous rejection. Mr. Atkins referred him to a man in the back room. His old application was obtained from the files but he was told only that he had "missed some things of importance" (UT 515).
2. A notice was sent informing him that his application was rejected for failure

to answer correctly one or more pertinent questions. His application form proper is complete in every respect. It contains no indications of errors or omissions. A paper with Article IX of the Constitution typed on it with instructions to read aloud and explain in writing has been inserted. The paper is signed by the applicant and contains the following explanation: "the rights of the people is to vote by the Constitution of the United States." At the bottom of this insert someone has written, "NO."

January 6, 1964:

1. He filled out another application form at the registration office (UT 515).
2. He was notified that his application had been rejected for failure "to answer correctly one or more pertinent questions." There is a circle marking question 11(b) in which he omitted the date of residence in his precinct. In all other respects his application form proper is complete and correct. An insert signed by the applicant contains the following type-written question:

How many members of the
Federal House of Representatives
are currently accredited to
the State of Alabama? Why?

The applicant had answered: "There are
ten members in the Federal House of
Representatives currently accredited
to the State of Alabama. to make laws."
Both parts of his answer are marked
with circles.

Summary
of the
Testimony and Applications
of
JEAN ETHEL PRITCHETT
(Negro)

Applications Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
February 18, 1963	Rejected	B-8
May 20, 1963	Rejected	B-60
November 18, 1963	Rejected	B-445

Facts Showing Qualifications

Age: Each of her applications shows her date of birth to be January 10, 1939.

Residence: Each of her applications shows her to be a resident and to have resided in this county since birth.

Character: Each of her applications shows that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each of her applications she swore to support and defend the State and Federal governments and disavowed belief in and affiliation with any group which advocates the overthrow of the State or federal

government by unlawful means. She also affirmed her loyalty by her responses on each application.

Ability to Read and Write: Each of her applications shows her to be a high school graduate. She has filled out all three applications responsively and legibly.

Registration Experiences:

February 18, 1963

1. She filled out the application form in the front room of the registration office and was then directed to the back room. There she was asked orally, "What is the Constitution of the United States?" She replied that the Constitution of the United States "is a document of laws of the United States to promote the general welfare of the people and the people of the United States." (UT 240). She was made to give the answer three times. (UT 240). The Registrar present examined her application form, but mentioned no errors or omissions to her (UT 240).
2. Two weeks later she received a notice of rejection stating she had "failed to answer correctly one or more pertinent

questions." At the top of the first page of her application form someone has written the word "No." Question Number 17 is marked with a circle and a question mark. This question, asking for some of the duties and obligations of citizenship, is answered with, "truth, honesty, and religion." There are no other indications of errors or omissions and her application is complete and correct in all other respects. At the top of page three of her application there is a note, which says, "Constitution: O.K."

May 20, 1963

1. She returned to the registration office and, after first giving her name, was handed an application form. She filled out her form after which she was sent to the back room. There she was asked, "Who makes the laws of the Federal Government?" She answered, "We do. The people." The registrar replied "Yeah." No other questions were asked (UT 241). She then made inquiry with respect to her first application. She asked what questions she had missed, but was told "No, I

can't tell you that. That is against our laws."

2. She was sent a notice informing her that her application had been rejected on the grounds that she had "failed to answer correctly one or more pertinent questions." On her application form question number 2, asking for some of the duties and obligations of citizenship, has been marked with a circle. She had answered with the words, "Truth, honesty, and religion." In every other respect the application form has been filled out completely and correctly. There are no other indication of errors or omissions. At the top of page three of her application there appears a note, which says, "Questions - No."

October 7, 1963

1. She returned to the registration office, but was unable to enter. After standing in line for some period of time, she left briefly to go to the street side of the office and get a package out of her husband's car. When she returned to her place in line, Mr. Clark ordered her to the end of the line. She continued to

wait but was unable to get in

(UT 243).

November 13, 1963

1. She returned to the registration office and filled out another application form. Afterwards she was again sent to the back room where she was handed a sheet of paper with Amendment IX of the Constitution typed on it. She read it, the excerpt, to the Registrar and then wrote down her understanding of it. She had gone to the registration office at about 9:00 a.m., and was finally admitted at approximately 3:00 p.m. (UT 244). When she entered she saw that people were being taken one at a time and there were empty seats in the office (UT 245). Most of the people in line were Negroes (UT 245).
2. After completing this third application she was still not registered to vote (UT 238). Her application form is filled out completely and is marked with no indication of errors or omissions. At the top of the first page there is a note, which says, "3:15 #36."

Summary
of the
Testimony and Application
of
SARAH MAE SEALS
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
October 23, 1963	Rejected	B-322

Facts Showing Qualifications

Age: Her application indicates that she was born on July 7, 1935, and was over 21 when she applied.

Residence: Her application shows her to have been a resident of Dallas County since birth.

Character: Her application shows that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On her application she swore under oath to support and defend the State and federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or federal government by unlawful means.

Ability to Read and Write: Her application shows

that she had completed the tenth grade in school. She filled out her form responsively and legibly.

Registration Experience

October 23, 1963:

1. She had to appear each day for four days before she was premitted to fill out an application form (UT 359).
2. Later she received a notice of rejection which stated, "you failed to answer correctly one or more pertinent questions." On this application there is a circle drawn around the words, "name or names," in question 2 which calls for the names by which the applicant has been known for the past five years. She had not written any name in the blank space. In all other respects this application is completed perfectly. Above the oath part has been written the words, "Questions -- No."

Summary
of the
Testimony and Application
of
THEODORE SHERRER
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
April 15, 1963	Rejected	B-39

Facts Showing Qualifications

Age: Mr. Sherrer's application shows he was born April 4, 1936.

Residence: His application shows that he has been a resident of his ward or precinct since birth.

Character: His application shows that Mr. Sherrer has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: Mr. Sherrer's application contains correct answers to each question concerning his loyalty.

Ability to Read and Write: Mr. Sherrer's application shows him to be a high school graduate. He answered each question on the application form responsively and legibly.

Registration Experience

April 15, 1963

A-38-a . . .

1. After Mr. Sherrer filled out his application form, Colonel Bibb asked him oral questions (UT 464). The questions asked for the three branches of government and the duties of each. Mr. Sherrer's answer to the first question was legislative, judicial, and executive. His answer to the second question was that the duty of the legislature is to make the law, the duty of the judiciary is to interpret the law, and the duty of the executive is to enforce the law (UT 464). Colonel Bibb then had Mr. Sherrer repeat an oath and sign the form (UT 464).
2. Mr. Sherrer received a notice of rejection indicating "he had failed to answer correctly one or more pertinent questions." There appears to be no notation by the board on the questionnaire. The application is perfect. At the top of page three there is a notation, "Constitution No."

Summary
of the
Testimony and Application
of
JOSEPHINE TATE
(Negro)

Application Filed

<u>Date</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
May 18, 1964	Rejected	B-577

Facts Showing Qualifications

Age: March 31, 1943

Residence: Her application shows her to be a resident of Dallas County and of the City of Selma for at least five years.

Character: Her application shows that she has not been convicted of any disqualifying crimes and otherwise meets the character qualifications.

Loyalty: On her application she swore under oath to support and defend the State and federal constitution and disavowed belief in and affiliation with any group which advocates the overthrow of the State or Federal governments by unlawful means.

Ability to Read and Write: Her application shows her
to be a high school graduate. She
is a secretary by occupation.

Registration Experience

May 18, 1964:

1. After filling out an application form she was directed to the back room where she was asked to write down some words and to read some excerpts from the Constitution (UT 528,29). She read to the Court without difficulty two of the four excerpts from the Constitution contained in her application form. She also explained to the Court the excerpt she had been required to explain in writing on her application (UT 530,31).
2. She later received a notice of rejection which indicated she had "failed to answer correctly one or more pertinent questions". There is no specific indication on her application form as to the reason for the rejection; but three question marks appear on the third page. One is beside the answer of "The Government" to the question: "Who coins money, the state or the United States?". Another is beside an excerpt from the Constitutions, and the third is beside the explanation of the excerpt from the Constitution.

Summary
of the
Testimony and Applications
of
LUCILLE R. TERRY

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
June 17, 1963	Rejected	B-99
October 23, 1963	Rejected	B-357

Facts Showing Qualifications

Age: Her applications indicate she was born on October 25, 1931, and was over 21 each time she applied.

Residence: Each of her applications shows her to be a resident of Dallas County and to have resided in this county since birth.

Character: Each of her applications shows that she has not been convicted of a disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each application she swore under oath to support and defend the State and Federal Constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or Federal governments by unlawful means.

Ability to Read and Write: Each application shows

her to be a high school graduate. She indicates on the forms that she has worked as a typist. She has filled out both forms responsively and legibly.

Registration Experience

June 17, 1963:

1. She filled out her application form in the front room of the registrar's office. It is unclear whether she was asked oral questions (UT 376, 377).
2. She later received a notice of rejection which stated, "You have failed to answer correctly one or more pertinent questions." There is no specific indication on her application form as to the reason for the rejection. There is a circle near a blank at the beginning of the application which calls for the name of the applicant. She had omitted writing her name in the blank space. In all other respects her application is completed perfectly. Above the oath section the words, "Questions: -No," are written.

October 23, 1963:

1. She filled out another application and was directed to the back room. She was given a white piece of paper with "two or more questions written on the piece

of paper," (UT 379). She was asked to explain the Ninth Amendment to the Constitution and replied, "To keep and protect the rights of the people, regardless of race, color, or creed," (UT 380, 381). She was then asked "to be excused," and was not permitted to explain any more of the questions (UT 380).

2. She was sent a notice of rejection which stated, "You failed to answer correctly one or more pertinent questions." On the application there is a circle marking question 2(b) in which she omitted the date of residence in her precinct. In all other respects this application is completed perfectly. Above the oath section are written the words, "Questions: -No."

Summary
of the
Testimony and Applications
of
ALICE HINES TUCKER
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
April, 1963	Rejected	B-33
August 19, 1963	Rejected	B-178
April 20, 1964	Rejected	B-562

Facts Showing Qualifications

Age: At the time of her first application Mrs. Tucker, (then Miss Alice Hines), was under twenty-one. Her three applications, show her date of birth as July 26, 1942. She was over twenty-one when she applied the second and third time.

Residence: All three applications show that Mrs. Tucker has been a resident of Alabama since her birth. The first application shows that she became a resident of Dallas County in 1957, while the other two applications give 1953 as the year in which she became a resident of Dallas County. The first application lists no date on which she

became a resident of her ward or precinct while her second and third applications show that she became a resident of her precinct or ward in 1953.

Character: Each of her applications show that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each of her three applications, Mrs. Tucker swore under oath to support and defend the State and Federal Constitutions and disavowed belief in an affiliation with any group which advocates the overthrow of the State or federal governments by unlawful means. She also affirmed her loyalty by her responses to other questions on each of her applications.

Ability to Read and Write: Each of her applications shows Mrs. Tucker to have two years of college education. She is a graduate of Junior College and was, at the time of the trial, a clerk typist (UT 454). She filled out all three application forms responsively and legibly. At the trial, Mrs. Tucker read three excerpts from the Federal Constitution without difficulty (UT 458, 459).

Registration Experiences:

April, 1963 (date uncertain)

1. Mrs. Tucker filled out her first application form in the Registrar's office. She took it into the next room, and a man there asked her orally what the three branches of the government were. She answered, legislative, executive, and judicial (UT 455). The man who had asked the question then looked at the application and noticed that Mrs. Tucker was not yet twenty-one. A lady then said, "That disqualifies her" (UT 455).
2. No further action was taken on this application, as Mrs. Tucker was not yet twenty-one at the time she filled it out.

August 19, 1963

1. On her second attempt to register, Mrs. Tucker again filled out a form and went into another room. There she was asked who was the Vice-President, she answered, Johnson. Then the man asking the questions asked whether the Vice-President were Robert Kennedy; she said, "No." He asked, "who is it then." She answered Johnson, and there were no further questions that she could remember (UT 457). While filling out

her application, Mrs. Tucker was told that she could cross out mistakes if she initialed them (UT 460).

2. , The Board sent a notice of rejection stating that Mrs. Tucker had "failed to answer correctly one or more pertinent questions." Question number 10 is circled, as Mrs. Tucker did not answer that question. The question is, "Has your name been previously stricken from the list of persons registered." In all respects this application is perfect. On the top of page three of her application is a note which says, "Questions: - No."

April 20, 1964

1. This time, the application Mrs. Tucker filled out contained insert Part III (3). She was asked to read excerpts from the Constitution.
2. Mrs. Tucker was sent a notice of rejection that stated she had "failed to answer correctly one or more pertinent questions." There is a notation beside question 11 initialed, apparently, by Registrar Bibb. That question asks whether the applicant has previously applied for and been

denied registration as a voter. Mrs. Tucker answered "yes." The question went on to ask, "If so, when and where." Mrs. Tucker answered "August, 1963 - Selma, Alabama - Dallas County." She said nothing concerning the time her application was not considered because she was under age. The notation in the margin states, "3rd time." There is no other notation on part one or two of the application. On the insert Part III there are five words circled in the part of the application concerning excerpts from the Constitution. The five words are, "excerpts," "prejudice," "establishment," "electors," and "appointed." In the part of the application where the applicant is to write words dictated from the Constitution, Mrs. Tucker wrote five words, affirmation, tranquility, expiration, posterity, and qualifications. She omitted the second i from tranquility; there is a notation under it spelled, "tranquillity." There are no other notations on the application, and in all other respects it is perfect.

Summary
of the
Testimony and Applications
of
INEZ C. TURNER
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
May 6, 1963	Rejected	B - 43
August 19, 1963	Rejected	B - 185
December 16, 1963	Rejected	B - 468

Facts Showing Qualifications

Age: Each of her applications shows her date of birth to be June 1, 1929.

Residence: Each of her applications shows her to be a resident of Dallas County and to have resided in this county since birth.

Character: Each of her applications shows that she has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each of her three applications she swore under oath to support and defend the State and federal institutions and disavowed belief in and

affiliation with any group which advocates the overthrow of State or federal government by unlawful means. She also affirmed her loyalty by her response on each of her applications.

Ability to Read and Write: All of her applications show her to be a high school graduate. She is a file clerk by occupation with twelve years experience. She has filled out all five application forms responsively and legibly.

Registration Experiences

May 6, 1963:

1. She filled out her application forms and was then directed to the back room. There she was asked one question by Colonel Bibb. She was unable to understand the question, which she recalls as, "Unidentified man in the street, bona fide" (UT 522). She informed Col. Bibb that she could not understand the question, but received no reply. (UT 522,23).
2. She later received a notice of rejection which indicated she had "failed to answer correctly one or more

pertinent questions." There is no specific indication on her application form as to the reason for the rejection, but question 18 is circled. She omitted the dates upon which she became a bona fide resident of Dallas County and of her precinct. However, the application showed her residence to have remained the same for five years. In all other respects this application is completed perfectly. On the top of page three of her application is a note which says, "Authorized question: no Answer."

August 19, 1963

1. She filled out another application form and when she went to the back room this time she was asked orally, "Who is the Vice President?" She answered "Lyndon Bird Johnson." UT 524). She was asked no other questions. (UT 524).
2. She was sent a notice of rejection which said, "You failed to answer correctly one or more pertinent questions." On this application there is a circle in question 1 around "G.W.C. Homes," which refers to her address. In question 18

there is a circle around the word "single," which refers to her marital status. There is no indication of any errors or omissions. This application is completed perfectly. On the top of page three of her applications is a note which says, "Questions No."

October, 1963:

She attempted to register once, but was unable to get into the office. (UT 524).

December 16, 1963:

1. She filled out another application and was then given a written question to answer. (UT 525).
2. She was sent a notice of rejection which said, :You failed to answer correctly one or more pertinent questions." On this application there is a circle at question 14 indicating that she omitted to list names by which she had been known during the previous five years. She had written the following interpretation of Amendment IX to the Constitution, "The enumeration in the

Constitution of certain rights shall
not be construed to deny or disparage
others retained by the people."

There is a note beneath this interpretation, "Copy? JRB."

Summary
of the
Testimony and Applications
of
ANNIE H. WILLIAMS
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
October 13, 1963	Rejected	B-277
April 20, 1964	Rejected	B-568

Facts Showing Qualifications

Age: Both of her applications indicate that she was born on March 20, 1913. She was over 21 each time she applied.

Residence: Each of her applications shows her to be a resident of Dallas County and to have resided for several years in the county.

Character: Each of her applications show that she has not been convicted of a disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each application she swore in the Oath to support and defend the State and federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or Federal governments by unlawful means.

Ability to Read and Write: All of her applications show her to be a high school graduate. She filled out both application forms responsively and legibly.

Registration Experience

October 13, 1963:

1. She filled out the application form in the registration office. She was asked no oral questions, nor was any comment made to her concerning her application form when she submitted it (UT 332).
2. She later received a notice of rejection which indicated as the reason that she had "failed to answer one or more pertinent questions." There is no specific indication on her application form as to the reason for the rejection; but question 15(a) is circled. It relates to the priority of the duties and obligations of citizenship over those owed to secular organizations. She answered "no."

April 20, 1964

1. She filled out another application and was required to answer four questions about government, read from excerpts taken from the Constitution; and write words from dictation.
2. She was sent a notice of rejection which said, "You failed to answer correctly one or more pertinent questions." There are circles marking

questions 5, 11 and 13. Question 5, to which she gave no answer, requests a listing of the "places you have lived the past five years." On question 11, the applicant supplied the date when she had previously applied for and been denied registration as a voter, but she did not give the place. She also gave no answer to question 13 which asked if the applicant has ever been "dishonorably discharged from military service." The third question on government, "What is the lawmaking body of Alabama called?", is circled; the applicant had written "Don't know" in the answer space. In the section, "Excerpts From The Constitution," from which the applicant read, the following words are circled: "excerpts," "construed," "prejudice," "quorum," and "purpose."

On the dictation part of the form, she had written "tranquility," (TRANQUILLITY" is printed below), and "established," (ESTABLISH is printed below). The printing in capitals below the word is not hers (UT 334). She understood the Registrar to have said "established" (UT 335).

Summary
of the
Testimony and Applications
of
ROBERT WORMELY
(Negro)

Applications Filed

<u>Dates</u>	<u>Board Action</u>	<u>Pl. Ex. No. 6</u>
May 6, 1963	Rejected	B-45
July 5, 1963	Rejected	B-121
September 16, 1963	Rejected	B-193
January 27, 1964	Rejected	B-499
May 18, 1964	Rejected	B-580
July 20, 1964	Rejected	B-673

Facts Showing Qualifications

Age: All of his applications indicate that he was born on November 27, 1920. Therefore, he was over 21 years old each time he applied.

Residence: Five of his applications show him to be a resident of Dallas County for twenty-four years and one indicates that he has been a resident of the County for thirty-five years. In any case he was living in the County for more than six months at the time he first attempted to register.

Character: Each of his applications shows that he has not been convicted of any disqualifying crime and otherwise meets the character qualifications.

Loyalty: On each of his six applications he swore under oath to support and defend the State and federal constitutions and disavowed belief in and affiliation with any group which advocates the overthrow of the State or federal governments by unlawful means. He also affirmed his loyalty by his responses on each of her applications. His loyalty is attested to by his record in the Armed Services. During his two years in the military he saw combat in Europe (UT 313, 14).

Ability to Read and Write: Five of his forms show him to have completed eight years of school. On one form the answer to the question relating to education is omitted. He is a carpenter by occupation (UT 313). He has filled out all six of his application forms responsively and legibly.

Registration Experiences

May 6, 1963

1. He filled out an application form and then went into a back room of the registrar's office where he was asked some questions by Mr. Allen and Mr. Bibb. He was asked the question "Define a man in the street, not technical but sexual" (UT 316). After the question was repeated three times to him, the applicant still did not understand it (UT 317).
2. He was sent a notice of rejection which said, "You have failed to answer correctly one or more pertinent questions." On the top of page three of his application form is a note which says, "Authorized question: No answer." There are no questions marked on the application and the application form contains no errors or omissions.

July 5, 1963

1. He filled out an application and does not remember if he was asked any questions on that occasion (UT 317, 18).
2. He was sent a notice of rejection which said, "You omitted one or more pertinent

questions." On this application he did not answer question 8, which is circled, or question 20, which is also circled. Question 8 asks whether the applicant would give aid and comfort to enemies of the state or national governments. Question 20 asks for educational and business experience. He answered "no" to Question 13, which reads "If you are self-employed, state the nature of your business" and this question is circled. He also answered "No" to question 13(a), which reads, "If you have been employed by another during the last five years state the nature of your employment and the name or names of such employer or employers and his or their address." This question is circled, with the comment, "(Employed at Craig Field)."

September 16, 1963

1. He filed an application and was then asked "who was the Representative in our District, the Federal Representative." He answered that we had two Senators from Alabama, John Sparkman and Senator Lister Hill (UT 319).
2. He was sent a notice of rejection which said, "You failed to answer

correctly one or more pertinent questions." On this application there is a circle marking question 19(b) in which he incorrectly stated the precinct number. On the top of page three of his application is a note which says "Question No."

January 27, 1964

1. He stated that on this occasion, a Mr. Atkins filled out the first part of the form and that he filled out the second part (UT 320). He was required to answer a written governmental question (T 319).
2. He was sent a notice of rejection which said, "You failed to answer correctly one or more pertinent questions." On his application form he answered question one, dealing with his place of birth and present address, by putting in only the place of his birth. This question is circled. He also answered question 4(b), dealing with the number of his precinct, incorrectly; this question is circled. The printed question that was given to him was, "How many members of the Federal

House of Representatives are currently
accredited to the State of Alabama?

Why?" His answer was "three" His
answer is circled, as is the word
"Why."

May 18, 1964

1. After he filled out his application he
was given a new type of a test (UT 320).
2. He was sent a notice of rejection which
said, "You failed to answer correctly
one or more pertinent questions." There
is a circle marked around question 11,
indicating that the part of the ques-
tion which asked when he had previously
applied for and been denied registration
as a voter. In the excerpts from the
Constitution, the words "adhering" and
"affirmation" are circled. He correctly
read aloud in full to the court the
entire constitutional passage in which
the word "adhering" is contained (UT 320).
In the space for writing from dictation
he wrote incorrectly the following words:
"Composition," "apportionment," "Counter-
feiting," "appellate" and "equally." He
wrote them as follows: "comporsition,"
"apporement," "countfiteing," "apperllated"
and "eaugley." He also wrote "to me this

mean i must Support the Laws of both State an City." This is circled and has a question mark next to it. He is unclear from the application what Mr. Wormely was interpreting.

July 20, 1964

1. He was aksed to fill out another Part III and to answer the questions on the insert (UT 321). He was also asked to spell certain words.
2. A notice of rejection was sent him which indicated he "failed to answer correctly one or more pertinent questions. There appear to be no errors on Parts I and II. There is a circle around one of the questions on government in Part III. He had misspelled legislature. There is a circle beside his interpretation of the Tenth Amendment, which was, "it true the powers not delegated the constitution are reserved to the state." He misspelled despotism, seizures, infringed, intoxicating, and important on his spelling test. Asked at the trial whether he was able to understand the words the Registrar wanted him to write he stated, "I don't

know whether I was able to understand them all because they didn't repeat them. I believe I understood him to say he wasn't going to repeat; he was going to call off and it was up to you to get them" (UT 321).

APPENDIX B

TABLES

TABLE I
STATISTICS

This Table, which is in two parts, gives the number of applications filed with the Dallas County Board of Registrars between May 5, 1962, and August 17, 1964. It shows the board action and percent rejected, by race. These figures are based upon a count of the registration forms (Pl.Ex. 6) and upon an analysis of the Board's Minute Book (Pl.Ex. 4).

Part A of this Table gives general statistics by six periods. These periods reflect the following significant events in the history of this case.

1. May 5, 1962, through November 14, 1962: from the trial in this case to this Court's initial decision;
2. November 15, 1962, through September 30, 1963: from the initial decision of this Court to the decision of the Court of Appeals;
3. October 1, 1963, through November 1, 1963: from the decision of the Court of Appeals to the issuance by this Court of implementing orders;
4. November 2, 1963, through February 16, 1964: from the date of the implementing orders to the end of the period during which the Board of Registrars used the old application form set out in Appendix D-I;

5. February 17, 1964, through May 17, 1964: the period during which the new form set out in Appendix D-II was used, but no interpretation test was given; and
6. May 18, 1964, through August 17, 1964: from the date on which the Board reinstituted its requirement that an applicant give his interpretation of an excerpt from the Constitution to the date of the last application plaintiff photographed prior to the October 5, 1964, hearing of this case.

Part B of the Table, commencing on page B-I-d, presents the same statistics broken down by month.

PART A

GENERAL STATISTICS

<u>Date</u>	<u>Applied</u>		<u>Accepted</u>		<u>Rejected</u>		<u>Percent Rejected</u>	
	W	N	W	N	W	N	W	N
May-Nov. 14 1962	W N	60 16	59	7	1	9	1.7	56.2
Nov.15,1962 thru Sep.30,1963	W N	339 237	244	32	95	205	28.03	86.5
Oct.1-Nov.1 1963	W N	326 216	243	11	83	205	24.5	95.13
Nov.2,1963 thru Feb.16,1964	W N	388 137	300	22	88	115	25.52	84.0
Feb.17-May17 1964	W N	61 53	52	6	9	47	14.76	89.0
May 18 - Aug.17,1964	W N	58 136	47	15	11	121	19.0	89.0
<u>TOTALS:</u>		1232 795	945	93	287	702	23.30	88.30

PART A

STATISTICS BY MONTH

<u>Date</u>	<u>Applied</u>		<u>Accepted</u>		<u>Rejected</u>		<u>Percent Rejected</u>	
	W	N	W	N	W	N	W	N
<u>1962</u>								
May	W	6	6		0		0	
	N	2	1		1		50.0	
June	W	3	3		0		0	
	N	2	1		1		50.0	
July	W	9	9		0		0	
	N	10	5		5		50.0	
Aug.	W	11	11		0		0	
	N	2	0		2		100.0	
Sept.	W	9	8		1		11.1	
	N	0	0		0		0	
Oct.	W	16	16		0		0	
	N	0	0		0		0	
Nov.	W	14	13		1		7.1	
	N	3	2		1		33.3	
Dec.	W	5	3		2		40	
	N	2	0		2		100	
<u>1963</u>								
Jan.	W	73	59		14		19.2	
	N	3	1		2		66.7	
Feb.	W	21	12		9		42.8	
	N	14	7		7		50.0	
Mar.	W	9	7		2		22.2	
	N	17	0		17		100.0	
April	W	5	2		3		60.0	
	N	17	0		17		100.0	
May	W	29	16		13		44.8	
	N	31	1		30		96.8	
June	W	45	31		14		31.1	
	N	41	6		35		85.4	
July	W	69	52		17		24.6	
	N	38	7		31		81.6	

<u>Date</u> <u>1963</u> (Cont)		<u>Applied</u>		<u>Accepted</u>		<u>Rejected</u>		<u>Percent</u> <u>Rejected</u>	
		W	N	W	N	W	N	W	N
Aug.	W	33		21		12		36.7	
	N		64		7		57		89.0
Sept.	W	42		34		8		19.0	
	N		7		1		5		85.7
Oct.	W	296		219		77		26.0	
	N		215		11		204		94.9
Nov.	W	115		78 ^{*/}		37		32.2	
	N		55		4		51		92.7
Dec.	W	46		42		4		8.7	
	N		20		3		17		85.0
<u>1964</u> **									
Jan.	W	246		197		49		19.9	
	N		54		15		39		72.2
Feb.	W	22		16		6		27.3	
	N		27		1		26		96.3
Mar.	W	31		26		5		16.1	
	N		12		2		10		83.3
April	W	13		11		2		15.4	
	N		23		3		20		86.9
May	W	10		8		2		20.0	
	N		12		4		8		66.7
June	W	7		7		0		0	
	N		14		2		12		85.7
July	W	22		15		7		31.8	
	N		98		6		92		93.9
Aug.	W	25		23		2		8.0	
	N		12		3		9		75.0

^{*/} Three of the white persons accepted in November and December 1963 appear in the Minute Book, but their forms were not among those photographed by the plaintiff and are not in evidence.

^{**/} Eight rejected (six Negro and two white) applications for January 1964 are reflected in the Minute Book but were not among the forms photographed by the plaintiff and are not in evidence. The same is true of one white accepted application.

TABLE II

APPARENT BASES FOR REJECTIONS

Although the Dallas County Board of Registrars has failed to articulate any standards for grading the performance of applicants, the plaintiff, through careful analysis of all accepted and rejected applications during the period involved, has attempted in this Table to present in general categories the apparent bases for rejections. The categories used are:

"Supplemental Question" - Included in this category are rejections which were apparently based solely on the applicant's responses to the oral questions asked between May 5, 1962, and November 1, 1963, and to the written questions devised and used by the Board between November 4, 1963, and February 3, 1964.

"Loyalty Questions" - Included in this category are rejections which were apparently based solely on the applicant's responses to the belief questions numbered 15, 16, 17, 18, 19 and 20(a) on the old standard form.

"Insert" - Included in this category are rejections which were apparently based solely on the applicant's performance on the tests included in the Insert Part III portion of the registration form.

"Parts I & II" - Included in this category are rejections which were apparently based solely on the applicant's responses to the questions in Parts I and II of the new registration form.

"Both" - This category includes rejections which, prior to February 17, 1964, were apparently based on the applicant's responses to both the supplemental and the loyalty questions and, on and after February 17, 1964, were apparently based upon the applicant's performance on Parts I, II, and III.

"Miscellaneous" - This category includes all rejections which were apparently based on other grounds.

The table is presented in four periods, as follows:

1. May 5, 1962, through October 25, 1963:
The Board used supplemental questions calling for definitions or facts and used the old form;
2. October 28, 1963, through November 1, 1963:
The Board required an oral interpretation of the Ninth Amendment and used the old form;
3. November 4, 1963, through February 3, 1964:
The Board used the old form; through December 1963 it required applicant's to write an interpretations of the Ninth Amendment; and thereafter required applicant's to tell the number of members Alabama has in the House of Representatives and why; and
4. February 17, 1964, through August 17, 1964:
The Board used the new form, including Insert Part III.

Following the table is a list of the identification numbers in Plaintiff's Exhibit No. 6 showing which rejected applications are included in each category. Rejected applications of Negroes constitute Plaintiff's Exhibit No. 6B; rejected applications of white persons constitute Plaintiff's Exhibit No. 6D.

PROBABLE REASONS FOR REJECTION,
BY RACE

		May 5, 1962- Oct.25, 1963	Oct.28, 1963- Nov.1, 1963	Nov.4, 1963- Feb.3, 1964	Feb.17,1964- Aug.17, 1964
		W N	W N	W N	W N
Supplemental Questions	W	53	16	53	--
	N	202	28	62	--
Loyalty Questions	W	39	0	2	--
	N	39	7	1	--
Both	W	22	4	15	3
	N	19	3	16	51
Miscellaneous	W	43	2	16	2
	N	108	13	30	6
Inserts	W	--	--	--	15
	N	--	--	--	108
PARTS I & II	W	--	--	--	0
	N	--	--	--	3

NUMBER OF APPLICATIONS AND REJECTIONS, BY RACE

Applied	W	638		57		418		119	
	N		415		53		138		189
Rejected	W	157		22		88 ^{*/}		20	
	N		368		51		115 ^{**/}		168

Total Applications, May 5, 1962, through August 17, 1964:	W	1232
	N	795

Total Rejections, Mary 5, 1962, through August 17, 1964:	W	287
	N	792

*/ Two of the white persons rejected in January 1964 appear in the Minute Book, but their forms were not among those photographed by the plaintiff and are not in evidence.

**/ Six of the Negroes rejected in January 1964 appear in the Minute Book, but their forms were not among those photographed by the plaintiff and are not in evidence.

May 15, 1962 - October 25, 1963

Supplemental Question		Loyalty Question		Both		Misc.	
N	W	N	W	N	W	N	W
1F	7	6A	1	9	1A	1	3
1F2	8	8	2	16	5	1A	11
2	10	36B	4	38	6	1B	20
2A	13	76	18	48	9	1C	22
6	14	93	26	52	12	1D	25
7	19	94	51	54	15	1E	31
10	21	98	52	56	16	1H	32
11	23	101	55	58	17	1G	34
13	24	112	59	64	33	3	35
14	29	120	60	81	36	4	37
17	30	121	61	82	41	5	40
18	38	125	62	86	46	12	42
19	39	140	69	278	49		43
20	44	142	72	285	50	15	48
21	45	148	75	293	107	26	53
22	47	153	83	295	108	27	56
22A	54	159	84	306	115	31	57
23	67	162	90	308	117	33	58
24	68	163	99	345	120	35	63
25	70	176	102		122	46	64
28	71	199	121		124	49	65
29	73	205	125		154	50	66
30	74	208	126			51	76
	79	211	127			57	77
34	81	212	128			62	78
31A	82	216	130			65	80
36	85	222	132			67	98
36A	86	232	137			69	100
36C	87	234	138			70	101
37	88	237	139			75	103
39	89	240	141			75A	106
41	91	244	146				109
42	92	249	147			77	111
40	93	258	148			78	112
43	94	262	149			82A	114
44	95	270	150			86A	118
45	96	272	156			87	119
47	97	277	157			97	129
53	104	324	159			99A	131
55	105					102	134
59	110					104	140
60	113					107	143
61	116					108A	155
63	123					110	

May 5, 1962 - October 25, 1963

<u>Supplemental</u> <u>Question</u>		<u>Loyalty</u> <u>Question</u>		<u>Both</u>	<u>Misc.</u>
<u>N</u>	<u>W</u>	<u>N</u>	<u>W</u>	<u>N</u>	<u>W</u>
66	133				124
68	135				128
71	136				129
72	142				134
73	144				136
74	151				149
79	152				154
80	158				160
83	159A				161
84					172
85					
88					174
89					175
90					188
91					189
92					194
95					195
96					196
97A					197A
99					198
100					204
103					209
105					215
106					217
108					230A
109					239
111					241
113					245
114					247
115					248
116					250
117					252
118					254
119					257
122					260
123					261
126					263
127					269
131					274
132					275
133					279
135					282
137					284
138					284A

May 5, 1962 - October 25, 1963

<u>Supplemental</u> <u>Question</u>	<u>Loyalty</u> <u>Question</u>	<u>Both</u>	<u>Misc.</u>
<u>N</u> <u>VL</u>	<u>N</u> <u>VL</u>	<u>N</u> <u>W</u>	<u>N</u> <u>W</u>
139			291
141			292
143			294
144			297
145			298
146			301A
147			302
150			303
151			305
152			310
155			311
156			311A
157			313
158			316
164			318
165			319
166			321
168			326
169			328
167			329
170			333
171			336
173			
177			
178			
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May 5, 1962 - October 25, 1963

<u>Supplemental</u> <u>Question</u>	<u>Loyalty</u> <u>Question</u>	<u>Both</u>	<u>Misc.</u>
<u>N</u> <u>W</u>	<u>N</u> <u>W</u>	<u>N</u> <u>W</u>	<u>N</u> <u>W</u>
207			
210			
213			
214			
218			
219			
220			
221			
223			
224			
225			
227			
228			
229			
230			
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May 5, 1962 - October 25, 1963

<u>Supplemental</u> <u>Question</u>	<u>Loyalty</u> <u>Question</u>	<u>Both</u>	<u>Misc.</u>
<u>N</u> <u>W</u>	<u>N</u> <u>W</u>	<u>N</u> <u>W</u>	<u>N</u> <u>W</u>
296			
299			
300			
301			
304			
307			
309			
312			
314			
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October 28, 1963 - November 1, 1963

<u>Supplemental</u> <u>Question</u>		<u>Loyalty</u> <u>Question</u>		<u>Both</u>		<u>Misc.</u>	
<u>N</u>	<u>W</u>	<u>N</u>	<u>W</u>	<u>N</u>	<u>W</u>	<u>N</u>	<u>W</u>
346	160	353	0	354	161	350	166
349	160A	360		359	163A	355	177
351	162	370		363	170	356A	
356	163	383			172	362	
357	164	390				369	
358	165	392				377	
361	167	394				378	
364	169					381	
365	171					386	
366	173					387	
367	174					395	
368	175					396	
371	176					397	
372	178						
373	178A						
374							
375							
376							
379							
380							
382							
384							
385							
388							
388A							
389							
391							
393							

November 4, 1963 - February 3, 1964

<u>Supplemental</u> <u>Question</u>		<u>Loyalty</u> <u>Question</u>		<u>Both</u>		<u>Misc.</u>	
<u>N</u>	<u>W</u>	<u>N</u>	<u>W</u>	<u>N</u>	<u>W</u>	<u>N</u>	<u>W</u>
399	179	439	215	402A	196	398	182
400	180		232	403	197	406	183A
401	183			405	205A	408	188A
402	185			411	206	412A	193
407	186			415	207	414	198
409	187			418	228	420	200
410	188			427	234	428	201
412	189			434	238	431	202
413	190			435	243	432	203
416	191			443	246	433	212
417	192			447	251	440	219
421	192A			452A	252	441	225
423	194			472	253	445	229
424	195			483	260	448	230
425	199			489	261	449	241
426	204			508		456	259
429	205					457	
430	208					471	
436	209					473	
437	211					475	
438	213					476	
442	214					477	
444	216					488	
446	217					497	
453	218					498	
454	220					500	
455	221					502	
458	222					505	
459	223					510	
460	224					513	
462	226					516	
463	227						
464	231						
465	233						
466	235						
467	236						
468	237						
469	239						
470	240						
474	242						
478	244						
482	245						
484	247						

November 4, 1963 - February 3, 1964

<u>Supplemental</u> <u>Question</u>		<u>Loyalty</u> <u>Question</u>		<u>Both</u>		<u>Misc.</u>	
<u>N</u>	<u>W</u>	<u>N</u>	<u>W</u>	<u>N</u>	<u>W</u>	<u>N</u>	<u>W</u>
485	248						
486	249						
490	250						
492	254						
493	255						
494	256						
495	257						
496	258						
499	262						
501	263						
503							
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515							

B-II-k

February 17, 1964 - August 17, 1964

<u>Insert</u>		<u>Parts I and II</u>		<u>Both</u>		<u>Misc.</u>	
<u>N</u>	<u>W</u>	<u>N</u>	<u>W</u>	<u>N</u>	<u>W</u>	<u>N</u>	<u>W</u>
518	264	585	0	517	267	539	266
519	265	556		520	272	593	269
522	268	561		521	277	600	
523	270			524		622	
525	271			526		626	
527	273			536		654	
528	274			540			
529	275			541			
530	276			542			
531	278			548			
532	279			551			
533	280			554			
534	281			555			
535	282			556A			
537	283			558			
538				560			
543				567			
544				568			
545				570			
546				576			
547				578			
549				583			
550				588			
552				590			
553				594			
557				595			
562				602			
562A				603			
563				604A			
564				605			
565				606			
566				608			
569				611			
571				616			
572				617			
573				618			
574				620			
575				621			
577				623			
579				634			
580				638			
581				648			
582				649			
584				651			

February 17, 1964 - August 17, 1964

<u>Insert</u>	<u>Parts I and II</u>	<u>Both</u>	<u>Misc.</u>
<u>N</u> <u>W</u>	<u>N</u> <u>W</u>	<u>N</u> <u>W</u>	<u>N</u> <u>W</u>
586		653	
587		659	
589		665	
591		669	
592		674	
596		678	
597		679A	
598			
599			
601			
604			
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650			

February 17, 1964 - August 17, 1964

<u>Insert</u>	<u>Parts I and II</u>	<u>Both</u>	<u>Misc.</u>
<u>N</u> <u>W</u>	<u>N</u> <u>W</u>	<u>N</u> <u>W</u>	<u>N</u> <u>W</u>
652			
655			
655A			
657			
658			
660			
661			
662			
663			
664			
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673A			
674A			
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676A			
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TABLE III

EDUCATION OF APPLICANTS

This Table lists, by educational level of the applicant, the exhibit numbers of applications filed with the Dallas County, Alabama, Board of Registrars between May 5, 1962, and August 17, 1964. In those instances in which the education of the applicant could not be determined from information contained on the form, the application is listed under the column, "Not Stated."

This Table is arranged in four periods to correspond with the education statistics in the brief. The column titled "Attended High School" lists the forms which show that the applicant attended, but did not necessarily graduate from, high school. The column titled "Attended College" lists the forms which show that the applicant attended, but did not necessarily graduate from, college. The applications are identified by their number in Plaintiff's Exhibit No. 6. For example, the first application in the "Negro Rejected" column is Plaintiff's Exhibit No. 6 B 10.

May 5, 1962 - October 25, 1963

Level of Education	Negro Accepted (A)	Negro Rejected (B)				White Accepted (C)					White Rejected (D)	
1-5		10	174	233	327	92	404				35	149
		66	194	240	333						48	150
					334							
6-8	19	1A	85	166	259	61	338	386	413	450	3	92
	45	1B	97A	167	275	87	363	387	417A	469	5	99
	49	1E	98	189	283	143	367	389	420	470	8	102
		3	100	193	291	255	371	403	421	482	22	108
		9	101	207	295	326	377	410	438		23	110
		18	102	215	297						24	115
		19	105	218	304						31	116
		22	108	219	305						33	120
		27	114	224	306						39	121
		36	125	243	311						41	124
		36A	126	244	317						42	129
		37	136	258	323						50	130
		45	154	260	324						54	131
		64	157	263	325						57	132
		67	165	267	336						61	133
											62	134
											66	135
											67	136
											68	137
											72	140
											84	146
Attended High School (12)	28	1F	89	213	287		179	324	370	415	1A	73
	37	2A	115	221	292		182	325	375	419	2	75
		5	116	228	294	16	186	327	378	423	9	79
		6	122	230A	299	45	191	330	379	429	10	87
		8	123	236	300	46	266	331	380	433	11	94
		13	127	237	307	85	278	333	383	434	13	95
		16	128	242	308	88	280	337	384	435	14	104
		21	131	245	311A	89	287	339	390	437	16	107
		22A	132	249	315	90	290	340	392A	439	19	109
		25	137	254	319	100	296	344	393	441	21	117
		41	138	255	322	111A	298	345	394	442	30	122
		42	145	261	326	113	302	354	395	445	32	123
		44	151	265	329	117B	307	355	396	447	34	125
		46	163	268	331	121	308	358	397	449	38	128
		50	173	270	332	130	309	360	399	451	43	138
		60	181	271	335	135	313	361	402	452	44	139
		82A	190	272	337	138	314	362	402A	455	45	141
		86A	192	280	338	160	317	365	405	458	46	144
		88	199	284	339	162	319	366	406	466	49	147

Attended High School (12)	Negro Accepted (A)	Negro Rejected (B)				White Accepted (C)				White Rejected (D)		
				340	166	320	368	407	472	51	151	
				345				414	477	52	152	
									479	55	154	
									481	60	156	
									485	64	159A	
High School Grad.		1G	87	158	238		126	222	292	391	1	71
		11	90	161	241		131	223	297	392	7	78
	7	20	91	162	247		134	225	299	398	12	89
	9	29	92	164	253		140	227	301	408	17	90
	13A	31	99	172	262	11	144	228A	303	409	20	93
	18	36B	99A	177	264	14A	151	238A	304	411	26	96
	26	38	106	179	266	22	156	240	310	416	29	97
	32	39	107	182	273	31	159	241	312	417	47	105
	40	43	108A	183	277	49	161	242	315	418	59	111
	42	52	112	185	278	51	163	243	316	422	69	126
	46	54	117	186	281	53	165	246	317A	424	70	148
		55	119	187	284A	62	168	247	318	426		
		68	124	188	286	66	170	250	323	427		
		70	129	198	288	67	172	251	336	428		
		73	139	200	289	69	173	252	342	430		
		74	140	205	293	71	174	252A	346	431		
		76	144	208	312	77	177	252B	349	436		
		77	146	216	318	94	184	256	352	440		
		79	148	225	330	96	194	257	353	444		
		83	149	229	342	98	195	259	357	446		
				231		102	198	264	359	453		
						104	201	268	364	454		
						105	202	269	369	460		
						109	203	271	373	461		
						110	204	275	374	467		
						114	205	279	376	471		
						116	208	284	382	473		
						119	209	285	385	474		
						125	213	286	388	475		
							216			476		
										480		

Attended College	Negro Accepted	Negro Rejected			White Accepted				White Rejected	
	(A)	(B)			(C)				(D)	
8		1	56	142	201	55	111	215	289	18 91
11		6A	58	143	203	57	112	218	291	74 127
14		7	59	152	206	58	115	219	293	81 142
15A		12	71	153	210	12 59	117	220	294	83 158
16		14	81	155	211	14 60	117A	224	300	85 159
17		24	82	160	214	15 63	122	228	305	88
20		28	95	170	223	17 64	123	229	306	
24		31A	103	171	230	19 65	127	231	311	
46A		32	113	176	234	20 68	128	233	334	
		33	120	178	256	21 70	129	238	335	
		34	133	180	259	23 72	132	239	341	
		36C	134	184	276	24 73A	136	245	347	
		40	141	191	285	25 74	139	248	350	
		48			320	26 75	141	249	356	
					341	29 77A	148	252C	372	
						30 79	149	253	381	
						34 80	157	254	400	
						35 81	164	258	412	
						36 84	169	260	425	
						36A 86	171	263	432	
						37 91	178	273	443	
						37A 93	181	276	456	
						38 99	185	277	459	
						39 101	187	277A	462	
						41 106	206	281	464	
						43 107	207	282	468	
						48	211		478	
							214		483	
16 & Over	5	1D	69	111	235	76	154	200	272	4 98
	5A	1F2	80	118	296	82	155	210	274	82 113
	6	17	84	135		13 95	158	212	283	86
	10	23	85	150		27 97	167	216A	288	
	12	26	93	168		28 103	175	217	295	
	13	30	96	169		32 108	176	221	321	
	15	35	104	197		33 118	180	226	328	
	21	53	109	227		36B 120	188	230	329	
	22					40 124	189	232	332	
	23					42 137	190	237	343	
	25					44 145	192	261	348	
	27					47 147	193	262	457	
	30					52 150	196	265	486	
	31					54 152	197	267		
	33					73 153	199	270		
	34									
	35									
	36									
	38									
	39									
	41									
	43									
	48									

<u>Not Stated</u>	<u>Negro Accepted</u>	<u>Negro Rejected</u>	<u>White Accepted</u>					<u>White Rejected</u>	
	(A)	(B)	(C)					(D)	
	47	1C 75A 209 290	56	78	401	448	484	6	77
		1H 78 212 298						15	80
		2 94 217 301						25	100
		4 97 220 301A						36	101
		15 110 222 302						37	103
		47 121 232 303						40	106
		49 147 239 309						53	112
		51 156 246 310						56	114
		57 159 248 313						58	118
		61 175 250 314						63	119
		62 195 252 316						65	143
		63 196 257 321						76	155
		65 197A 274 328							157
		72 202 279 343							
		75 204 282							

October 28, 1963 - November 1, 1963

1-5

		370							
6-8		346 365 383 394	489	496	525	537		160A	174
		354 367 387 395						162	
		361 382 393							
Attended High School		349 360 379 388	487	494	524	533	548	163	175
		350 363 380 388A	492	504A	527	535		163A	176
		359 378 384 390	493	514	528	539		164	177
		391			532			169	178
								169A	178A
								171	
High School Grad.	51	351 356 375 389	490	504	509	522	541	165	172
		353 357 381 392	491	505	512A	526	545	167	173
		352	499	506	515	531			
			503	507	518	540			
Attended College	50	371 372 373 376	488	508	517	534	547	160B	170
			495	511	519	538	549		
			497	512	520	543			
			501	513	521	544			
			502	516	523	546			
					529				
16 & Over	52		500	510	530	536	536A		
							542		

<u>Not Stated</u>	<u>Negro Accepted</u>	<u>Negro Rejected</u>				<u>White Accepted</u>					<u>White Rejected</u>	
	(A)	(B)				(C)					(D)	
		355	363	374	396						161	166
		356A	364	377	397							
		358	366	385								
		362	369	386								
<hr/>												
		<u>November 4, 1963 - February 3, 1964</u>										
1-5		414	434 472	500	513							
6-8	60	399	420	456	499	588	605	719	775	798	182	229
		403	427	462	504	601A	667	744	781	802	206	251
		410	436	474	508					806	209	257
		413	439	486	511						218	261
		417	454	489	514						224	
					515							
<hr/>												
Attended High School	64 74	398	421	466	493	552	574	656	712	778	183	227
		405	437	476	496	554	576	661	720	785	183A	228
		407	438	482	501	555	577	672	723	787	187	231
		409	442	483	503	558	579	673	731	794	188	235
		415	452A	485	506	559	582	679	739	800	188A	237
		418	459	488	509	560A	594A	688	743	803	189	238
						561	601	691	751	809	190	240
						563	608	692	752	813	191	242
						565	615	693	760	823	192A	243
						569	632	701	762	827	194	245
						570	653	709	771	828	197	246
						573	655	710	773	837	201	248
										840	207	249
										842	213	252
											217	256
											221	258
											222	259
												263

High School Grad. (12)	Negro Accepted	Negro Rejected				White Accepted				White Rejected		
	(A)	(B)				(C)				(D)		
	57	400	426	458	494	556	591A	658	724	769	179	219
	73	401	429	467	495	560	593	660	726	774	185	220
		402	443	468	507	562	594	664	732	777	186	223
		411	444	470	512	566	595	680	732A	784	192	232
		412	445	478		571	596	682	733	796	193	233
		423	446	490		572	598	697	737	799	195	244
		425	455	492		578	602	699	741	805	199	247
						583	603	702	742	810	203	253
						585A	616	707	746	812	208	255
						590	619	711	747	819	216	260
						590A	623	713	750	821		
						591	631	714	756	830		
							643	715	758	831		
							649	718	767	832		
							651	722		834		
							644			839		
							645					
Attended College	53	402A	435	464	484	553	622	666	728	788	200	236
	59	424	453	465		564	624	669	729	790	211	239
	61	430	460	477		567	625	670	735	793	212	250
	62					568	626	671	736	797	215	262
						581	628	674	738	801		
						584	629	675	745	804		
						587	630	676	749	807		
						592	633	677	753	808		
						597	634	681	755	816		
						599	635	683	759	817		
						604	637	687	761	820		
						606	638	694	763	826		
						607	639	695	764	829		
						609	640	696	766	833		
						610	646	703	768	835		
						610A	650	705	770	836		
						611	654	708	772	841		
						614	659	716	779			
						618	662	717	782			
						621	665	721	783			

16 & Over	Negro Accepted	Negro Rejected				White Accepted					White Rejected	
	(A)	(B)				(C)					(D)	
	56	416	448	463	502	575	641	686	730	792	214	241
	58					580	642	689	748	795	225	254
	63					585	647	690	754	811		
	65					589	648	698	757	814		
	66					600	652	700	765	815		
	67					610B	657	704	776	818		
	68					617	663	706	780	824		
	69					620	668	725	789	825		
	70					636	684	727	791	838		
	71											
	72											

Not Stated	54	406	433	471	487	557	586	627	685	734	180	205
	55	408	440	473	497					740	196	205A
		412A	441	475	498					786	198	226
		428	447	479	505						202	230
		431	457	480	510						204	234
		432	469	481	516							

February 17, 1964 - August 17, 1964

1-5	589	503	622	639							268
				640							
				654							

6-8	517	555	606	637	885	891					275	276
	523	566	607	645								277
	531	567	608	648								
	533	570	610	649								
	537	578	616	651								
	541	579	617	652								
	542	580	620	655								
	547	582	623	661								
	548	583	627	663								
	551	584	631	669								
	553	593	632	673								
	554	600	634	674								
				676								
				678								

Attended High School	Negro Accepted (A)		Negro Rejected (B)			White Accepted (C)					White Rejected (D)	
	81	518	560	604A	646	849	915	923	933	942	266	273
	89	520	561	605	653	868	917				267	281
		521	564	611	655A						272	283
		529	574	614	657							
		530	575	615	658							
		536	585	618	659							
		539	588	619	660							
		544	590	635	662							
		546	595	638	664							
		549	597	642	666							
		550	599	643	668							
			604		671							
					675							
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High School Grad. (12)	78	519	556	577	624	848	863	874	893	904	265	278
	79	522	557	581	625	850	867	875	896	924	269	279
	85	524	558	591	626	852	869	880	897	937	271	280
		526	562	592	629	855	870	888	899	946	274	282
		527	563	594	630	859	872	892	902			
		528	565	601	636							
		534	568	602	641							
		535	571	609	647							
		552	573	621	650							
					667							
<hr/>												
Attended College	75	525	545	572	598	843	877	900	918	935	264	270
	84	538	556A	586	633	857	879	901	919	939		
	86	540	562A	587	670	861	883	903	920	941		
	91	543	569	596	672	862	884	905	925	943		
	92				679	871	894	906	927	947		
	77					875	895	908	932	948		
						876	898	914	934			
<hr/>												
16 & Over	76	612	644	673A	679A	844	854	866	890	926		
	80	613	665	674A		845	856	881	909	928		
	82	628	672A	676A		846	858	882	911	931		
	83					847	860	886	913	936		
	87					851	864	887	916	938		
	88					853	865	889	921	940		
	90									944		
	93									945		
	94											
	95											
<hr/>												
Not Stated		532	576									
<hr/>												

TABLE IV

ERRORS AND OMISSIONS ON ACCEPTED APPLICATIONS

This table lists the errors and omissions on the application forms of Negro and white persons which have been accepted by the Dallas County Board of Registrars between May 5, 1962, and August 17, 1964. Forms without errors or omissions are not listed. The standard application form question numbers are used to identify questions on applications filed between May 5, 1962, and February 3, 1964. A copy of this standard form may be found in Appendix D-I.

The application forms are listed according to their identification number in Plaintiff's Exhibit No. 6.

White Applicants

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit 6 C</u>	<u>Errors or Omissions in Questions</u>
May 7, 1962	12	4, 6
"	13	5b
May 14, 1962	15	4, 6, 17
June 4, 1962	16	2, 5b
"	17	3, 5b
June 18, 1962	19	5b, 8, 11
July 2, 1962	20	5b
"	22	2, 5b, 11
"	24	5b, 11
"	25	5b
August 28, 1962	33	5b
"	36	4, 4a, 5, 6

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit 6 C-</u>	<u>Errors or Omissions in Questions</u>
September 4, 1962	38	5b
"	39	10
"	42	4
October 1, 1962	46	2, 5b
"	48	5b
"	49	11
October 15, 1962	53	5b
"	54	5b
"	55	5b
"	59	5b
November 7, 1962	62	3, 11
"	64	5b
"	65	5b
"	67	5b
November 19, 1962	68	3
"	69	5b
"	71	11
"	72	1, 5b
"	73	5b, 11
December 3, 1962	74	5b
January 7, 1963	77	4
January 14, 1963	77A	5b, 21
January 15, 1963	79	4, 5b
"	80	5b
January 16, 1963	81	5b
"	82	5b
January 21, 1963	84	2
"	87	4
"	88	1
"	90	11
"	91	5b
"	93	1, 5b
January 23, 1963	99	5b
"	102	2, 3, 5b
January 25, 1963	103	3
January 28, 1963	104	4, 5b
"	105	5b
"	106	3
"	108	1, 2, 4, 5b
"	111	3
"	112	3
"	114	5b
"	115	5b

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit 6 C-</u>	<u>Errors or Omissions in Questions</u>
January 30, 1963	120	5b
"	122	5b
"	123	2, 5b
"	124	5b
"	125	4, 5b
"	126	5b
"	127	5b
"	128	5b
"	128A	5b
"	132	3, 5b, 17
February 4, 1963	134	4, 5b
"	137	1
"	138	5b, 11
"	141	4
"	143	3
March 4, 1963	148	2
"	150	2
"	151	2, 11
"	154	3, 5b
April 1, 1963	155	5b
May 6, 1963	158	5b
"	160	5b
May 20, 1963	161	5b
"	162	2, 11
"	166	2, 5b
"	167	5b
"	170	5b
"	171	5b
"	169	3, 4
June 3, 1963	173	2
"	177	5b
"	176	5b
June 17, 1963	178	5b
"	179	4
"	180	4
"	181	5b
"	185	2
"	187	2, 4, 5b
"	189	2, 3, 5b
"	190	3, 5b
"	191	5b, 11
"	192	5b
"	194	5b
"	195	5b
"	196	5b
"	197	4, 5b
"	198	5b
"	199	5b
"	201	4
"	203	2, 5b
"	204	5b
"	182	2, 5b

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit 6 C-</u>	<u>Errors or Omissions in Questions</u>
July 1, 1963	205	2, 3, 5b
"	206	5b, 11
"	208	2, 5b
"	209	4, 5b
"	210	5b
"	212	5b
"	214	3, 5b, 11
"	215	5b
"	216	5b
"	234	5b
July 2, 1963	218	5b
"	220	4, 5b
"	222	5b
"	223	3, 4
"	225	3, 5b
"	227	2
"	228	5b
"	229	3, 5b
"	230	5b
July 5, 1963	231	3, 5b
"	232	3, 5b
"	233	2, 5b
July 8, 1963	237	2, 5b
"	238	4, 11
"	238A	5b
July 15, 1963	239	4, 5b
"	240	5b, 11
"	241	5b
"	242	11
"	243	4
"	245	2, 5b
"	246	4, 5b, 11
"	247	1, 2, 5b
"	248	2, 3
"	249	11
"	250	5b
"	251	5b
"	252	5b, 11
"	253	5b
"	252A	5b, 11
"	252B	5b
"	252C	1, 5b
"	254	5b
August 5, 1963	255	4, 5b
"	256	5b
"	257	5b
"	258	2, 3, 5b, 21
"	259	5b, 11
"	260	11
"	262	2, 4
"	263	2, 5b

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit 6 C-</u>	<u>Errors or Omissions in Questions</u>
August 19, 1963	264	5b
"	265	5b
"	266	5b
"	268	5b
"	269	3
"	270	5b
"	271	5b
"	272	5b
"	275	5b
September 3, 1963	277	3, 5b
"	278	1, 3, 4, 5b
"	279	2
"	280	5b
"	281	5b
September 16, 1963	282	5b
"	283	5b
"	284	5b
"	285	5b
"	286	3, 4, 5b, 11
"	287	2, 3, 11, 21
"	288	1, 3
"	289	2, 4, 5b
"	290	5b
"	292	5b
"	293	4, 5b
"	294	4, 21
"	295	1, 3, 4, 5b, 11
"	296	2, 4, 5, 5b
"	298	5b
"	299	2, 3, 4, 11
"	300	4, 5b, 11
"	301	11
"	302	5b, 11
"	303	1, 2, 11
"	304	4
"	305	5b
"	306	4, 5b
"	307	2, 4, 5b, 21
"	308	1, 2
October 1, 1963	309	4, 5b, 11
"	310	5b
"	311	3, 5b
"	314	3, 11
"	315	11
"	316	2, 3, 5b
"	317	5b
"	351	5b
October 2, 1963	318	3, 4, 5b, 11
"	320	1, 2
"	323	5b
"	324	5b
"	328	4, 5b
"	330	5b
"	331	5b, 11

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit 6 C-</u>	<u>Errors or Omissions in Questions</u>
October 7, 1963	322	3, 5b
"	334	5b
"	335	5b
"	336	5b
"	337	5b
"	338	3, 4, 5b, 11
October 9, 1963	339	5b
"	340	21
"	341	5b
"	343	1, 5b
"	345	5b
"	347	5b
October 10, 1963	349	5b
October 11, 1963	350	3
October 12, 1963	360	2, 3, 5b
"	368	2
"	361	2, 4
"	367	1, 5b, 11
"	357	4
"	363	5b
"	352	2, 3, 5b
"	371	11
"	355	3, 5b, 11
"	366	3, 5b, 11
"	359	5b
"	354	3, 5b
"	353	2, 5b
October 16, 1963	376	11
"	374	5b
"	375	5b
October 17, 1963	376	11
"	378	5b, 11
"	379	5b
"	380	3, 5b, 11
"	381	5b
"	382	3, 4, 5b
"	383	2, 11
"	384	5b
"	385	3, 5b, 21
"	386	3, 4, 5b
"	387	5b, 11
"	388	3, 5b
"	389	5b
"	390	2, 4, 5b
"	391	4, 5b
"	392	5b
"	394	4, 5b
"	395	4

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit 6 C-</u>	<u>Errors or Omissions in Questions</u>
October 17, 1963 (Cont'd.)	397	4
"	398	4
"	400	2, 5b
"	401	2, 4, 5b
"	402	4
"	403	2, 4, 5b
"	405	5b
October 18, 1963	407	5b
"	410	2, 5b
"	411	2, 11
"	413	3, 4, 5b
"	415	2, 5b
"	416	5b
"	418	5b
"	422	5b
"	423	4
"	424	2, 5b
"	425	5b, 11
"	426	2, 4, 5b, 11
"	427	3, 4
October 21, 1963	428	4, 5b, 11
"	429	5b
"	430	5b
"	431	4, 5b
"	432	5b
"	433	3, 4, 5b
"	434	3, 4, 5b
"	435	3, 5b
"	436	5b
"	438	2, 3, 5b, 11
"	439	2, 3, 5b
"	440	3, 5b, 11
"	437	3, 4, 5b, 21
October 22, 1963	441	5b
"	442	4, 5b, 11
"	443	5b
"	444	2, 3, 4
"	445	2
"	446	5b, 11
"	447	2, 3, 4, 5b
"	448	11
"	449	2, 4, 5b
"	450	2, 5b, 11
"	452	4, 11
"	453	4, 5
"	454	1, 3, 4, 5b
"	455	3, 5b, 11
"	456	11
October 24, 1963	461	3
"	464	5b
"	471	5b
"	472	5b
"	473	3, 4

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit 6 C-</u>	<u>Errors or Omissions in Questions</u>
October 25, 1963	475	3
"	477	5b
"	478	3
"	479	11
"	480	2, 4, 5b, 11
"	482	5b
"	483	11
"	484	5b
"	485	5b
"	486	5b
October 28, 1963	487	11
"	489	5b
"	490	6
"	491	5b, 6, 11
"	493	5b
"	494	21, 2a, 6
"	495	5b
"	496	2a, 5b
"	499	5b
October 29, 1963	504A	6, 11
October 30, 1963	506	6
"	507	6
"	508	6
"	509	1, 5b
"	510	6
"	512	2a, 3, 5b, 6
"	512A	5b
October 31, 1963	513	5b
"	514	4, 4a, 5b, 6
"	515	5b, 6
"	516	6
"	517	5b, 6
"	518	6
"	522	5b, 6
"	523	5b, 6
"	524	6
November 1, 1963	526	5b, 6
"	527	5b, 6, 11
"	528	5b
"	529	5b
"	530	2a, 5b
"	531	5b
"	532	3, 5b, 6
"	533	5b
"	534	5b
"	535	2a, 5b
"	536A	5b
"	537	5b, 11
"	538	5b, 6
"	539	11

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit No. 6 C-</u>	<u>Errors or Omissions in Questions</u>
November 1, 1963 (Cont'd.)	540	2a, 5b, 11
"	541	5b
"	542	5b
"	543	-
"	544	5b
"	546	4a, 6
"	547	2a
"	548	5b
November 4, 1963	552	5b
"	553	6
"	554	6
"	555	5b, 6
"	556	6
November 5, 1963	557	5b, 6, 21
"	558	5b, 11
"	559	6
"	560	6
"	560A	6
November 6, 1963	562	5b, 6
"	564	6
"	565	2a, 4, 4a, 6
"	566	5b
"	568	6
"	569	6
November 7, 1963	570	5b
"	571	4, 4a
"	572	5b
"	573	2a, 5b
"	574	3, 5b, 6
"	576	5b, 6
"	577	5b
November 8, 1963	578	5b, 6
"	579	5b, 21
"	580	6
"	581	5b
"	582	5b, 11
"	585	6
November 18, 1963	585A	2a, 5b, 6
"	586	11
"	590A	5b
"	591	5b
November 20, 1963	587	5b, 6
"	595	5b
"	615	5b
"	639	5b, 6

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit 6 C-</u>	<u>Errors or Omissions in Questions</u>
November 21, 1963	588	5b, 6, 11
"	590	5b
"	601	5b, 6
"	605	5b, 11
"	607	5b
"	608	5b, 6
"	609	4, 4a, 5b, 6
"	610B	5b, 6
"	636	5b, 6
"	638	5b
December 11, 1963	602	6, 2a
"	603	6
"	604	6
"	610	5b
"	610A	5b
"	611	11
December 16, 1963	614	5b
"	621	-
"	623	5b
"	624	3
"	625	21, 5b, 6
"	626	3
"	628	3, 5b, 6
"	629	4, 4a, 6
"	630	5b, 6
"	631	5b
"	632	11
"	633	4, 4a, 6
"	634	3
January 6, 1964	641	5b, 6, 11
"	642	5b
"	646	5b
"	648	5b
January 20, 1964	650	6
"	651	6
"	652	6
"	653	5b
"	654	6
"	655	2a, 3, 5b, 21
"	656	2a, 5b, 11
"	658	5b
"	659	6
"	661	5b, 6
"	662	5b, 6
"	663	6
"	664	2a, 3, 5b
"	665	3, 5b, 6
"	666	5b
"	667	2a, 5b, 6
"	668	6
"	669	4, 4a, 6
"	670	2a, 5b, 6
"	672	6, 11, 21
"	673	2a, 5b
"	675	5b, 6

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit 6 C-</u>	<u>Errors or Omissions in Questions</u>
January 21, 1964	676	5b
"	677	3, 4, 4a, 5b, 6
"	679	5b, 11
"	680	5b, 6
"	681	2a, 3, 5b
"	682	5b, 6, 2a
"	684	5b
"	685	2a, 3, 5b, 11, 2
"	686	3, 5b
"	687	5b, 21
"	688	4, 4a, 21
January 22, 1964	689	5b
"	690	4, 4a
"	691	6, 11
"	692	2a, 5b
"	693	5b
"	694	5b
"	695	2a, 5b, 6, 11
"	697	5b, 6
"	698	5b, 6
"	699	5b
"	700	4, 4a, 5b, 6
"	701	2a
"	702	6
January 23, 1964	703	6
"	704	5b
"	705	5b
"	706	3, 5b, 6
"	707	5b, 6
"	708	3, 5b
"	709	5b, 6
"	710	2a, 3, 5b
"	711	6
"	712	5b
"	713	4, 4a, 5b, 6
"	714	6
January 24, 1964	715	6
"	716	3, 5b, 6
"	717	5b
"	718	4, 4a, 6
"	719	5b
"	720	2a, 5b, 6
"	721	6
"	722	11
"	723	4, 4a
"	724	2a, 5b
"	725	5b, 6
"	726	3, 5b

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit 6 C-</u>	<u>Errors or Omissions in Questions</u>
January 27, 1964	729	5b
"	730	6
"	731	2a, 5b, 6, 11
"	732	5b, 6
"	733	3, 5b, 6
"	735	5b
"	736	5b, 6
"	737	5b
"	738	5b
"	740	2a
"	741	2a, 11
"	742	2a, 3, 11
"	743	5b, 11
"	744	5b, 11
"	745	3, 6
"	746	2a, 5b
"	747	2a, 6
"	748	5b
"	749	5b
January 28, 1964	750	3, 5b, 11
"	751	5b
"	752	5b, 2a
"	753	5b, 6, 11
"	754	3, 6
"	755	5b, 6
"	756	5b, 6
"	757	2a, 5b
"	758	5b
"	760	5b, 6, 11
"	761	2a, 3, 6, 21
"	762	5b
"	763	5b
January 29, 1964	765	6, 11
"	767	5b
"	768	5b
"	769	5b
"	770	2a, 5b, 6, 8, 11
"	771	5b
"	773	5b
"	774	2a, 3, 5b, 6, 11
"	775	3, 11
"	776	5b, 11
"	777	5b, 6, 11
January 30, 1964	778	3, 5b, 6
"	779	3
"	781	2a, 3, 6, 11
"	782	6
"	783	5b, 6
"	784	2a, 5b, 6, 11, 21
"	785	2a, 5b
"	786	5b
"	787	2a, 21
"	788	6
"	789	2a, 5b, 11

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit 6 C-</u>	<u>Errors or Omissions in Questions</u>
January 30, 1964 (Cont'd.)	790	5b, 6
"	791	5b, 6
"	792	5b, 6
"	793	3
"	794	4, 4a, 6, 11
"	795	5b
January 31, 1964	797	5b, 11
"	798	5b
"	800	5b, 6, 11
"	802	5b, 6
"	803	2a, 5b
"	805	5b
"	806	2a, 3, 5b
"	807	4, 4a, 5b
"	808	5b, 6
"	809	2a, 5b, 11
"	810	5b, 11
"	811	5b
"	812	5b
"	813	5b, 6, 11
"	814	5b
"	815	6
"	816	3, 5b, 6
"	817	3, 6
"	819	3, 5b
"	820	3, 5b
"	823	2a, 5b, 6, 11
"	824	4, 4a, 6, 11
"	825	5b
"	826	4, 4a, 6, 11
"	827	5b, 6
"	828	6
"	829	5b
"	830	3
"	831	6, 11
"	832	5b, 11
"	833	6
"	834	6
"	835	5b, 6, 11
February 3, 1964	836	11
"	837	2a, 4, 4a
"	838	5b
"	839	3, 11
"	840	3, 5b, 11
"	842	3, 5b, 6

<u>Date of Application</u>	<u>Plaintiff's Exhibit No. 6-C</u>	<u>Errors or Omissions</u> ^{1/}			
		<u>Part II Questions</u>	<u>Part III Questions</u>	<u>Read.</u>	<u>Spell.</u>
February 17, 1964	843				1
"	844	4			
"	845	4			
"	846	4			
"	848	4, 13			1
"	850				2
March 2, 1964	852				1
"	861	(8), (9)			
"	862				1
"	863	11			
"	865	(8), (9), 10			
"	870	(13)			
March 18, 1964	871	(4), (8), 15			
"	872	(8), (17)			1
"	874	4, 12			
"	875	4			
"	876	15			
"	878	(17)			
April 6, 1964	879	4			2
"	880	4, 15	1		3
"	882				1
"	883	4	1		
"	884				1
"	886	(7), 8, 15	1		1
April 20, 1964	887		1		
	888		1	1	1
May 6, 1964	891	15			1
"	892	4			1
"	893				1
May 18, 1964	896	4			1

^{1/} The following application forms contain markings indicating an unsatisfactory interpretation of an excerpt of the Constitution: C-905, 913, 926, and 937. The numbers in parenthesis indicate the number of answers or responses in each category which appear to be not necessarily incorrect, but which are marked as apparently being unsatisfactory.

<u>Date of Application</u>	Plaintiff's Exhibit No. 6-C	Errors or Omissions			<u>Spell.</u>
		<u>Part II Questions</u>	<u>Part III Questions</u>	<u>Read.</u>	
June 3, 1964	898	15			1
"	899	4			
"	900	15			
"	901				1
"	903				(1)
"	904				1
July 7, 1964	905	4			1, (1)
"	906				1
July 9, 1964	908	15			
"	911	15			
"	913	15			1
"	915				(1)
"	916				1
July 20, 1964	917	4			2
"	919				
	923		(1)		
August 12, 1964	924	4, 6			
"	925				2
"	926				1
"	932		1		2
"	933				1
"	935				1
"	936				1
"	937				1
"	938				2
"	939				2
"	940				1
August 17, 1964	942		1		2
"	947				1

Negro Applicants

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit 6 A-</u>	<u>Errors or Omissions in Questions</u>
April 16, 1962	2	2a, 5b, 11
"	3	1, 2a, 5a, 5b, 11
May 14, 1962	5	5b, 11
June 18, 1962	5	5b
July 6, 1962	7	11
"	8	5b
"	9	5a
July 16, 1962	10	6
November 19, 1962	11	2a, 5b
"	12	5b
January 28, 1963	13	2a, 5b
February 4, 1963	13 A	5b
February 18, 1963	14	5b
"	15	1, 11
"	15 A	5b
"	16	1
"	17	3, 5a, 5b, 6
May 6, 1963	19	2a, 5b
June 3, 1963	21	5b
"	22	11
June 17, 1963	23	5b, 6
"	25	5b
July 1, 1963	26	3, 11
July 2, 1963	27	11
July 5, 1963	30	6
"	31	11
July 15, 1963	33	6
August 5, 1963	34	11
"	35	11
August 19, 1963	37	6, 11
"	38	11
"	39	5b
"	40	4, 4a
October 7, 1963	42	6, 11
October 16, 1963	43	11

<u>Date of Application</u>	<u>Identification Number in Plaintiff's Exhibit 6 A-</u>	<u>Errors or Omissions in Questions</u>
October 21, 1963	45	5b, 6, 11
October 22, 1963	46	3, 5b, 11
October 24, 1963	46 A	3, 5b, 11
"	47	11, 3
October 25, 1963	48	6, 11
"	49	11
October 28, 1963	50	2a
November 6, 1963	53	11
November 8, 1963	55	5b, 6, 11, 20a
"	56	1
December 16, 1963	57	5b, 6
"	59	3
January 20, 1964	62	5b, 6, 11
"	63	5b, 3, 11
January 23, 1964	65	4, 4a, 5a, 5b, 6, 11
"	66	5b, 6, 11
"	67	5b, 11
"	69	5b, 11
January 24, 1964	71	5b
January 28, 1964	72	3
January 29, 1964	73	11
January 30, 1964	74	11

<u>Date of Application</u>	Plaintiff's <u>Exhibit No. 6-A</u>	<u>Part II Questions</u>	<u>Errors or Omissions</u> ^{2/}		
			<u>Questions</u>	<u>Part III Read</u>	<u>Spell</u>
February, 17, 1964	75			1	3
March 2, 1964	76	(9) 11	1	3	3
April 6, 1964	78				5
April 20, 1964	79		1		(2)
May 18, 1964	81	1, 2, 3, 4			1
"	82			1	2
"	83			1	4
"	84	2, 6			4
June 15, 1964	85	11			(1) 2
"	86	3, (9)		2	(1)
July 6, 1964	87		1		
"	88		1	1	2
July 8, 1964	89				1
"	90		2		1
"	91	3		4	3
July 9, 1964	92	11 (a)			
August 17, 1964	93		1	1	1
"	94	4			

2/ The following application forms contain markings indicating an unsatisfactory interpretation of an excerpt of the constitution: A-85, 87, 88, 89, and 90. The numbers in parenthesis indicate the number of answers or responses in each category which appear to be not necessarily incorrect, but which are marked as apparently being unsatisfactory.

APPENDIX C

LIST OF REJECTED NEGRO APPLICANTS
WHOSE APPLICATION FORMS SHOW THEM
TO BE QUALIFIED TO VOTE

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Acoff, Mrs. Lydia	402 Pollard St., Selma, Ala.	10-17-63
Anderson, Rebecca	Rt. 1, Browns, Ala.	10-28-63
Arnold, Ophelia	1501 St. Ann St., Selma, Ala.	10-23-63
Atchinson, Cecil J.	Rt. 1, Box 310-B, Selma, Ala.	10-28-63
Austin, James	1208 Hudson St., Selma, Ala.	7-15-63
Avery, Bessie Mae	2025 Clinton Ave., Selma, Ala.	4-6-64
Babcock, William Poole	515 Philpot Ave., Selma, Ala.	5-20-63
Bady, Ophelia H.	1118 Griffin Ave., Selma, Ala.	10-18-63
Bell, John C.	2904 Alabama Ave., Selma, Ala.	7-2-63
Benjamin, Sarah	1540 Plant St., Selma, Ala.	11-4-63
Bennett, James	3116 Medley Ave., Selma, Ala.	7-9-64
Biggins, William	Rt. 1, Box 82, Browns, Ala.	10-29-63
Bizzell, Essie Mae	315 Jeff Davis Ave., Selma, Ala.	10-15-63
Blackman, Amanda	Rt. 1, Box 129, Selma, Ala.	10-22-63
Blevins, Lucile	3112 Medley St., Selma, Ala.	10-25-63
Bolding, Mary A.	412-B, GWC Homes, Selma, Ala.	11-8-63
Bonner, Maxie	428-A GWC Homes, Selma, Ala.	10-16-63

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Bowden, Beatrice H.	3225 Willow Ave., Selma, Ala.	2-3-64
Boykin, Eula	537-D GWC Homes, Selma, Ala.	10-29-63
Boykin, Vertharene	1203-A Short King Selma, Ala.	8-5-63
Bradford, Harold Joe	1529 Range St., Selma, Ala.	10-28-63
Brayboy, James O.	513 Lawrence St., Selma, Ala.	7-2-63
Brazier, Napoleon	1500 Weaver St., Selma, Ala.	10-23-63
Brooks, Annette Ruth	2924 Water Ave., Selma, Ala.	10-25-63
Brooks, Rita	290 Perham Ave., Selma, Ala.	11-5-63
Browder, Anderson	1604 Lawrence St. Selma, Ala.	3-4-63
Brown, Adeline	1723 Lawrence St. Selma, Ala.	10-30-63
Brown, Crandell C.	1609 Lopsly St., Selma, Ala.	10-7-63
Brown, Myrtle H.	Rt. 3, Box 348, Selma, Ala.	8-19-63
Brown, Rosa J.	715 Lawrence St., Selma, Ala.	7-20-64
Brown, William	RFD, Box 108 Safford	7-20-64
Bullard, Marie H.	31 Mechanic St., Selma, Ala.	10-23-63
Burns, Roxie	1517 Union St., Selma, Ala.	11-5-63
Bush, A.O.	Rt. 3, Box 46-E, Selma, Ala.	7-3-63
Butler, Mary	1212 Griffin Ave., Selma, Ala.	10-16-63
Calhoun, Ola M.	1309 Union St., Selma, Ala.	8-5-63

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPOINTMENT</u>
Calhoun, Pauline	604 Green St., Selma, Ala.	10-25-63
Carter, Lawrence	Rt. 2, Box 192, Orville, Ala.	6-17-63
Caver, Willie Mae	207-B, GWC Homes Selma, Ala.	2-17-64
Cheese, Leon	306 St. Ann St., Selma, Ala.	10-22-63
Clay, Leola (Mrs.)	591 Division St., Selma, Ala.	10-21-63
Coates, Juanita	420 Small Ave., Selma, Ala.	10-21-63
Coleman, Frank, Jr.	832 Howard Ave., Selma, Ala.	10-7-63
Collins, Beulah	1400 Washington St. Selma, Ala.	10-16-63
Collins, Elnora G .	1906 2nd Ave., Selma, Ala.	10-16-63
Cook, Leo	101 Division St. Selma, Ala.	10-22-63
Cosby, Marjorie Marie	3106 Perham Ave., Selma, Ala.	10-23-63
Craig, Emma J.	1425 Mabry St., Selma, Ala.	6-3-63
Craig, Frances	1414 Sylvan St., Selma, Ala.	10-7-63
Craig, Robert James	1414 Sylvan St., Selma, Ala.	10-16-63
Craig, Thounda	2224 Hardie Ave., Selma, Ala.	1-27-64
Craig, Willie Dean	2224 Hardie Ave., Selma, Ala.	10-30-63
Craig, Zola Mae	215 Mechanic St., Selma, Ala.	10-30-63
Crawford, Gertrude	1613 Sylvan St., Selma, Ala.	10-24-63
Cunningham, Annie K.	1406 Church Selma, Ala.	7-7-64

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Cunningham, Fannie Mae	Rt. 1, Box 136, Orrville, Ala.	10-29-63
Cunningham, George	1613 St. Phillip St. Selma, Ala.	11-5-63
Cunningham, Joseph	Rt. 1, Box 136 Orrville, Ala.	10-23-63
Daniel, Priscilla G.	805 1st Ave., Selma, Ala.	8-19-63
Danzy, Olie W.	1326 Fairview Ave., Selma, Ala.	10-15-63
Davis, Joanna	804 Center St., Selma, Ala.	8-5-63
Davis, Lillie Bell	2309 Perham Ave., Selma, Ala.	10-16-63
Davis, Willie Mae	200 Small Ave., Selma, Ave.,	10-25-63
Davison, Robert		1-21-64
Dawson, Margaret	1309 Lauderdale St., Selma, Ala.	10-21-63
DePass, Joseph S.	1602 Minter Ave., Selma, Ala.	10-21-63
Dickerson, Ernestine	Rt. 1, Box 86, Browns, Ala.	2-17-64
Dixon, Bessie G.	509-B GWC Homes Selma, Ala.	10-17-63
Douglas, Geneva	Rt. 1, Box 766, Selma, Ala.	11-5-63
Dunning, Ola	1802 Lawrence St., Selma, Ala.	5-20-63
Durry, Bessie S.	815 Philpot Ave., Selma, Ala.	2-17-64
Durry, Paul N.	815 Philpot Ave., Selma, Ala.	5-18-64
Echols, Horace E.	97 Small Ave., Selma, Ala.	5-20-63
Edwards, Louise W.	1806 Sylvan St., Selma, Ala.	10-30-63

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Etheridge, Evelyn Ruth	211-B GWC Homes Selma, Ala.	8-19-63
Evans, Willie George	1417 St. Ann St., Selma, Ala.	9-16-63
Fails, Tommie	Rt. 4, Box 171-A, Selma, Ala.	7-9-64
Farris, Pearlie D.	1122 Morgan, Selma, Ala.	10-7-63
Fawlkes, Robert	Rt. 5, Box 185, Selma, Ala.	1-29-64
Fisher, Alice K.	Rt. 1, Box 147, Orrville, Ala.	10-22-63
Fortune, Ruth	409 Green St., Selma, Ala.	10-16-63
Fortune, Thomas J.	409 Green St., Selma, Ala.	10-7-63
Fowlkes, Johnny J.	Rt. 5, Box 185, Selma, Ala.	8-5-63
Fuller, Edna Belle	1721 Vine, Selma, Ala.	8-19-63
Fuller, Laura B.	1540 Plant Selma, Ala.	7-6-64
Furr, Jessie James	1505 Vine St., Selma, Ala.	10-30-63
Gamble, Eugene	P.O. Box 134	6-3-63
Gardner, Creola	Rt. 1, Box 115 Browns, Ala.	10-28-63
Gardner, Stanley	414-B GWC Homes Selma, Ala.	11-8-63
Gibson, Elvira	3001 Medley Ave., Selma, Ala.	10-25-63
Gilford, Pettus	Rt. 2, Marion Jct.	6-17-63
Gilford, Willie	Rt. 2, Box 32-D, Marion Jct.	6-17-63
Golden, James Perry	123 Sylvan St., Selma, Ala.	10-25-63

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Grace, Margie S.	3016 Roosevelt St., Selma, Ala.	10-30-63
Green, Bettie Jean	2021 Eugene Ave., Selma, Ala.	10-7-63
Green, Fannie Smith	Rt. 2, Box 278 Selma, Ala.	10-28-63
Gregg, Pearl	Orrville	2-17-64
Gresham, Laura	400 Mechanic St., Selma, Ala.	1-20-64
Gresham, Mose	400 Mechanic St., Selma, Ala.	1-28-64
Griffin, Eddie		2-18-63
Griffin, Margaret	309 Grey St., Selma, Ala.	7-8-64
Griffin, Marvyn	1521 Sylvan St., Selma, Ala.	12-16-63
Griffin, Sarah V.	Rt. 1, Box 137 Browns, Ala.	10-15-63
Gullett, Maggie	1521 Sylvan St., Selma, Ala.	4-6-64
Hall, Myrtleene (Mrs.)	1316 Eugene Ave., Selma, Ala.	11-6-63
Hanison, Lorenzo	17-A Grey St. Selma, Ala.	3-4-63
Harper, Dora		12-16-63
Harrell, Lillie B.	2501 Etheridge Ave., Selma, Ala.	7-8-64
Harrell, Lucinda	1801 Sylvan St., Selma, Ala.	7-5-63
Harrell, Norris	Rt. 1, Box 132 Browns, Ala.	3-18-63
Harrell, Truman	1801 Sylvan St., Selma, Ala.	7-5-63
Harris, Austella	1501 Sylvan St., Selma, Ala.	10-18-63
Harris, Daisey Lee	407 Dedman St., Selma, Ala.	10-2-63

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Harris, Kathleen P.	806 Small Ave., Selma, Ala.	4-20-64
Harrison, Lorenzo	17-A Grey St., Selma, Ala.	3-4-63
Harville, Eola	1323 Lauderdale St., Selma, Ala.	10-28-63
Hasty, Mamie Lewin	811 Philpot Ave., Selma, Ala.	12-11-63
Hatcher, Frances E. Berry	1400 Broad St., Selma, Ala.	6-17-63
Hayes, Willie Mae	506 Green St., Selma, Ala.	10-7-63
Henderson, William H.		1-6-64
Henley, Georgia	613-A Texas Ct. Selma, Ala.	8-19-63
Hicks, Geneva Duncan (Mrs.)	120 So. Mechanic St., Selma, Ala.	10-18-63
Hines, Alice	39-C GWC Homes Selma, Ala.	8-19-63
Hines, Eva Mae	39-C GWC Homes Selma, Ala.	6-17-63
Hobbs, Amanda K.	919 Minter Selma, Ala.	7-7-64
Hobbs, Willie L.	98 Minter Selma, Ala.	7-10-64
Hogan, Annie W.	1732 Sylvan St., Selma, Ala.	7-9-64
Hollins, Lemuel	1715 Lawrence St., Selma, Ala.	2-17-64
Hooks, Eddie Mae	208 Race Street Selma, Ala.	10-17-63
Howard, Mollie	1417 Eugene Ave., Selma, Ala.	7-9-64
Huggins, Geraldine	305 Race Street Selma, Ala.	8-5-63
Irvin, Bernice	1318 Eugene Selma, Ala.	7-8-64

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Jackson, Bessie M.	3029 Magazine Ave., Selma, Ala.	8-19-63
Jackson, David	Rt. 3, Box 352, Selma, Ala.	10-23-63
Jackson, Eliza	2029 Magazine Ave., Selma, Ala.	10-29-63
Jackson, Emma	2705 Griffin St., Selma, Ala.	7-7-64
Jackson, Leonia	327-A GWC Homes Selma, Ala.	11-4-63
Jackson, Matthew, Sr.	206 Minter Ave., Selma, Ala.	10-25-63
Jackson, Odessa	1530 Weaver St., Selma, Ala.	7-9-64
Johnson, Billie S.	404-B GWC Homes, Selma, Ala.	8-5-63
Johnson, Daisy	1122 Griffin Ave., Selma, Ala.	10-7-63
Johnson, Doris	120 Gregory St., Selma, Ala.	10-25-63
Johnson, Ella Mae	3217 Magazine Ave., Selma, Ala.	10-16-63
Johnson, Gertrude	Rt. 1, Box 141, Orrville, Ala.	10-22-63
Johnson, George	303 Small Ave., Selma, Ala.	10-18-63
Johnson, Joe Louis	Rt. 4, Box 122 Selma, Ala.	8-5-63
Johnson, Louise	1529 St. Ann St., Selma, Ala.	10-21-63
Johnson, Marie	3001 Pelham Ave., Selma, Ala.	7-7-64
Johnson, Mary	1409 Fairview Ave., Selma, Ala.	2-17-64
Johnson, Willia E.	Rt. 4, Box 122, Selma, Ala.	8-19-63

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Johnson, Willie Lee	Rt. 1, Box 90, Browns, Ala.	10-29-63
Jones, Evelina	Rt. 1, Box 94, Browns, Ala.	10-28-63
Kimbrough, Lillian Jean	Rt. 1, Box 113, Browns, Ala.	10-16-63
King, Willie Lewis	1425 St. Ann St., Selma, Ala.	8-19-63
Kirksey, Willie Mae	2903 Medley St., Selma, Ala.	10-23-63
Lawrence, John Etta	2603 Harris St.,	10-7-63
Lee, Lettie D.	611 Texas Court, Selma, Ala.	10-7-63
Leola Clay	591 Division St., Selma, Ala.	4-6-64
Leshore, Hattie Mae	Rt. 1, Box 18 Orrville, Ala.	7-15-63
Lightning, Alice	330-A GWC Homes Selma, Ala.	10-16-63
Lily, Addie	1513 Sylvan St., Selma, Ala.	10-15-63
Lowe, Annil Mae	1412 Bread St.,	10-7-63
McDole, Benjamin F.	1418 Union St., Selma, Ala.	1-28-64
McElroy, Roosevelt	Rt. 1, Box 19, Orrville, Ala.	8-19-63
McFarland, Viola	1209 Small Ave., Selma, Ala.	10-17-63
McGill, Edgar M.	2705 Ala. Ave., Selma, Ala.	10-29-63
Mack, Annie Lee	2519 Hardy Ave., Selma, Ala.	10-18-63
Manuel, Eliza Jane	2402 Perham Ave., Selma, Ala.	10-16-63
Marshall, Ethel Lee	1519 Duke St., Selma, Ala.	9-16-63

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Marshall, Trom J. Jr.	1519 Duke St., Selma, Ala.	10-31-63
Marshall, Josie	2010 1st Ave., Selma, Ala.	10-25-63
Martin, Amelia M.	2104 Union St., Selma, Ala.	11-6-63
Martin, Easter	Rt. 2, Box 281, Selma, Ala.	10-29-63
Martin, Geneva W.	1302 Pollard St., Selma, Ala.	10-21-63
Martin, Willie	1429 Jeff. Davis, Selma, Ala.	10-29-63
Martin, Willie Mae (Mrs.)	1408 Vine St., Selma, Ala.	6-15-64
Mauldin, Mary	RFD 2, Orrville	8-17-64
Maxey, Charley	611-A Texas Ct. Selma, Ala.	8-19-63
Maxey, Rosa Walker	611-A Texas Ct. Selma, Ala.	8-19-63
Merritt, Evelyn H.	1625 Voeglin Ave., Selma, Ala.	10-7-63
Miles, Beatrice	2919 Perham Ave., Selma, Ala.	5-18-64
Milhouse, Vera	516 Texas Ave., Selma, Ala.	10-7-63
Miller, Nathaniel	3217 Magazine Selma, Ala.	10-30-63
Mitchell, Ernestine	1926 Philpot St., Selma, Ala.	10-7-63
Mitchell, Floyd	1404 Church St., Selma, Ala.	10-7-63
Mitchell, Henry, Jr.	1606 Green St., Selma, Ala.	8-5-63
Mitchell, Margaret	1730 Sylvan St., Selma, Ala.	6-3-63

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Moore, John S.	P.O. Box 35, Selma, Ala.	2-3-64
Moore, Lutisha	Rt. 1, Box 110, Browns, Ala.	10-28-63
Moore, Margaret J.	1414 Broad St., Selma, Ala.	7-3-63
Moore, Susie J.	2521 High St., So. Selma, Ala.	10-18-63
Moorer, Pearl	Rt. 1, Box 215, Tyler, Ala.	9-16-63
Myers, Vivian	1317 Minter Ave., Selma, Ala.	8-5-63
Neely, Catherine	217 Small Ave., Selma, Ala.	10-30-63
Paries, Willie Ann	1420 St. Ann St., Selma, Ala.	1-6-64
Parker, Mildred	1608 Lawrence Selma, Ala.	7-7-64
Patterson, Jessie	Rt. 4, Box 171-A Selma, Ala.	7-9-64
Patterson, John H.	820 Small Ave., Selma, Ala.	1-30-64
Peasant, David M.	Minter, Ala.	10-18-63
Peeples, Mary Fuller	1721 Vine St., Selma, Ala.	2-18-63
Perkins, Etta S.	1707 Lawrence St., Selma, Ala.	10-23-63
Pernell, Samuel H.	Rt. 2, Box 32, Marion Jct, Ala.	10-21-63
Petteway, Amy Leathers	1721 Lawrence St., Selma, Ala.	7-3-63
Pope, Vernice T.	Rt. 2, Box 33-R, Marion Jct. Ala.	7-5-63
Powell, Eddie Mae	Rt. 2, Box 7, Orrville, Ala.	8-5-63
Powell, Josh	1409 Tremont St., Selma, Ala.	9-3-63

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Powell, Seborn	Rt. 2, Box 7, Orrville, Ala.	6-3-63
Prince, George	815 Division St., Selma, Ala.	10-21-63
Pritchett, Jean Ethel	513 Minter Ave., Selma, Ala.	5-20-63
Purifoy, Rosa	127 Minter Ave., Selma, Ala.	10-18-63
Rainey, Mrs. Loraine	1612 Vine St., Selma, Ala.	8-5-63
Ransom, Lizzie	1710 Oliver St., Selma, Ala.	11-4-63
Rawls, Idell	1400 Pollard St. Selma, Ala.	10-21-63
Robbins, Sadie	2218 Hardie St., Selma, Ala.	10-21-63
Rodgers, Charlie Jr.	818 First Ave., Selma, Ala.	7-8-64
Rodgers, Isiah	1712 Lawrence St., Selma, Ala.	10-7-63
Rogers, Julius C.	2013 Minter Ave., Selma, Ala.	2-3-64
Ross, Amanda	2406 High St., Selma, Ala.	6-3-63
Scott, Jeanie H.	1916 St. Phillip St., Selma, Ala.	10-18-63
Seals, Sarah Mae	Rt. 3, Box 69-A Selma, Ala.	10-23-63
Sealy, Leon	209 Buchner Ave., Selma, Ala.	10-25-63
Shannon, Elnora	2516 High St., Selma, Ala.	8-5-63
Shannon, Julia Bell	2516 High St., Selma, Ala.	10-24-63
Shannon, Ora Bell	2528 Perham Ave., Selma, Ala.	10-29-63
Sharpe, Leola C.	23 Mechanic St., Selma, Ala.	10-7-63

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Shaw, Callie Marie	1411 Franklin St., Selma, Ala.	7-5-63
Shaw, Cecil	2306 Eugene Ave., Selma, Ala.	10-7-63
Shaw, Haywood	1411 Franklin St., Selma, Ala.	10-30-63
Shelton, Fannie Louise	1712 Oliver St., Selma, Ala.	10-29-63
Sherrer, Theodore	104 Minter Ave., Selma, Ala.	4-15-63
Sims, Larry M.	Rt. 1, Box 115, Browns, Ala.	10-28-63
Slaughter, Rosie Lee	1509 St. Phillips St., Selma, Ala.	6-3-63
Smith, Aaron	3013 Shelley Ave., Selma, Ala.	11-7-63
Smith, Beulah M.	210 Race St., Selma, Ala.	10-22-63
Smith, Dollie Jane	1600 Lawrence St., Selma, Ala.	10-24-63
Smith, Emily Juanita	1607 Vine St., Selma, Ala.	8-5-63
Smith, Fred	Rt. 1, Box 140 Orrville, Ala.	8-5-63
Smith, Gertie Mae	405-B GWC Homes Selma, Ala.	10-29-63
Smith, John H.	1707 Small Ave., Selma, Ala.	6-15-64
Smith, Luetta S.	1310 St. Phillip St., Selma, Ala.	10-16-63
Smith, Rev. Louis S.	1310 St. Phillip St., Selma, Ala.	10-7-63
Smith, Sally E.	1315 Lawrence St., Selma, Ala.	10-18-63
Smith, Samuel Lee	1607 Vine St., Selma, Ala.	11-7-63

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Smith, Theoda	1515 St. Phillip St., Selma, Ala.	10-24-63
Smith, Virginia	1430 Eugene Ave., Selma, Ala.	10-24-63
Sowell, Francis	1605 Lapsley Selma, Ala.	8-17-64
Stanley, Sarah	1416 Lawrence St., Selma, Ala.	10-23-63
Steven, Lela Mae	1515 Leroy St., Selma, Ala.	4-6-64
Stewart, Judge Henry	1515 Minter Ave., Selma, Ala.	5-20-63
Strong, Jennie Lee	223 Grey St., Selma, Ala.	10-16-63
Strong, Mary Lee	613 Division St., Selma, Ala.	10-16-63
Tabb, Gus	Rt. 1, Box 125 Browns, Ala.	2-18-63
Tabb, Rosie Lee	708 Lawrence St., Selma, Ala.	10-17-63
Tate, Josephine	1313 Lauderdale St., Selma, Ala.	5-18-63
Tate, Pearline	1313 Lauderdale St., Selma, Ala.	11-4-63
Tate, Idella	Rt. 1, Box 119 Browns, Ala.	10-15-63
Taylor, Leroy	Rt. 1, Box 117 Browns, Ala.	6-17-63
Terry, Lucille Robinson	1229 Vaughan Ave., Selma, Ala.	10-28-63
Thomas, Lula Burk	2528 Perham Ave., Selma, Ala.	11-5-63
Thompson, Arcola	201 Division St., Selma, Ala.	10-30-63
Thrash, Milton C.	1919 1st Ave., Selma, Ala.	10-31-63

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Todd, Bessie M.	543-B GWC Homes, Selma, Ala.	10-29-63
Towns, W.T.	Rt. 1, Box 162	5-20-63
Turner, Inez	201-B GWC Homes Selma, Ala.	8-19-63
Tyler, Ethel	118 Mechanic Selma, Ala.	10-23-63
Tyus, Charlotte	Rt. 1, Box 97 Browns, Ala.	3-18-63
Tyrus, Dollie M.	1630 Duke Selma, Ala.	11-8-63
Underwood, Beatrice	2318 Perham Selma, Ala.	7-8-64
Vickers, John Henry	109 Cahaba Rd., Selma, Ala.	7-3-63
Voltz, David C.	1300 Green St., Selma, Ala.	8-19-63
Waites, James U.	204 Cedar Drive Selma, Ala.	10-28-63
Washington, Elnora C.	Rt. 1, Box 79 Browns, Ala.	7-1-63
Washington, Ethel M. Gardner	Rt. 1, Box 109 Browns, Ala.	4-15-63
Washington, Major	Rt. 2, Box 21-A Selma, Ala.	5-20-63
Washington, Odester Smith	1515 Duke St., Selma, Ala.	10-7-63
Watters, Ozetta	Rt. 4, Box 73-A Selma, Ala.	10-29-63
Watts, Flossie	919 Valley St., Selma, Ala.	8-19-63
Webster, Joseph, Jr.	33-B GWC Homes Selma, Ala.	7-3-63
William, Inola	1519 Helen St., Selma, Ala.	5-20-63
Williams, Annie H.	1206 Sylvan St., Selma, Ala.	10-18-63

<u>NAME</u>	<u>ADDRESS</u>	<u>DATE OF APPLICATION</u>
Williams, George C.	134-C GWC Homes, Selma, Ala.	4-20-64
Williams, Ida	1307 Duke St., Selma, Ala.	5-6-63
Williams, Lawrence	12-	12-16-63
Willis, Mrs. Lizzie M.	1420 Legrand St., Selma, Ala.	10-7-63
Wilson, Abraham L.	203 Minter Ave., Selma, Ala.	1-29-64
Wilson, Cora Bell	203 Minter Ave., Selma, Ala.	10-7-63
Woods, Annie L.	917 Valley St., Selma, Ala.	10-25-63
Wormely, Robert	1216 St. Phillip St., Selma, Ala.	7-5-63
Wright, Joe	Rt. 1, Box 59-A Sardis, Ala.	7-15-63
Young, Gertrude	917 Valley St., Selma, Ala.	7-6-64

APPENDIX D

REGISTRATION APPLICATION FORMS

USED SINCE MAY 5, 1962

Appendix D consists of the registration application forms used in Dallas County, Alabama, since May 5, 1962. Form I is the so-called "standard form." See Pl. Ex. No. 6 B 8. It was in use from May 5, 1962 through February 3, 1964. The order of the questions that appears in it is the order followed throughout the brief. Form II is the new form, used from February 17, 1964, to the present. It includes one of the twelve monthly Inserts Part III used with the new form from February 17, 1964, through August 17, 1964. See Pl. Ex. No. 6 B 665. Form III is one of the one hundred Inserts Part III used with the new form, Form II, from September 8, 1964, to the present. See Pl. Ex. No. 1.

APPLICATION FOR REGISTRATION, QUESTIONNAIRE AND OATH

I, _____ do hereby apply to the Board of Registrars of _____ County, State of Alabama, to register as an elector under the Constitution and laws of the State of Alabama, and do herewith submit answers to the interrogatories propounded to me by said Board.

Name of Applicant

QUESTIONNAIRE

1. State your name, the date and place of your birth, and your present address: _____

2. Are you married or single: _____ (a) If married, give name, residence and place of birth of your husband or wife, as the case may be: _____

3. Give the names of the places, respectively, where you have lived during the last five years; and the name or names by which you have been known during the last five years: _____

4. If you are self-employed, state the nature of your business: _____

(a) If you have been employed by another during the last five years state the nature of your employment and the name or names of such employer or employers and his or their addresses: _____

5. If you claim that you are a bona fide resident of the State of Alabama, give the date on which you claim to have become such bona fide resident: _____ (a) When did you become a bona fide resident of _____ County: _____ (b) When did you become a bona fide resident of _____ Ward or precinct _____
6. If you intend to change your place of residence prior to the next general election, state the facts: _____

7. Have you previously applied for and been denied registration as a voter: _____ (a) If so, give the facts: _____

8. Has your name been previously stricken from the list of persons registered: _____
9. Are you now or have you ever been a dope addict or an habitual drunkard: _____ (a) If you are or have been a dope addict or an habitual drunkard, explain as fully as you can: _____

10. Have you ever been legally declared insane:..... (a) If so, give details:.....

11. Give a brief statement of the extent of your education and business experience:

.....
.....
.....

12. Have you ever been charged with or convicted of a felony or crime or offense involving moral turpitude:..... (a) If so, give the facts:.....

.....

13. Have you ever served in the Armed Forces of the United States Government:..... (a) If so, state when and for approximately how long:.....

14. Have you ever been expelled or dishonorably discharged from any school or college or from any branch of the Armed Forces of the United States, or of any other country:..... (a) If so, state the facts:.....

.....

15. Will you support and defend the Constitution of the United States and the Constitution of the State of Alabama:.....

16. Are you now or have you ever been affiliated with any group or organization which advocated the overthrow of the United States Government or the government of any State of the United States by unlawful means:..... (a) If so, state the facts:

.....

.....

17. Will you bear arms for your country when called upon by it to do so:..... (a) If you answer no, give reasons:.....

.....

.....

18. Do you believe in free elections and rule by the majority:.....

19. Will you give aid and comfort to the enemies of the United States Government or the government of the State of Alabama:

.....

20. Name some of the duties and obligations of citizenship:.....

.....

.....

(a) Do you regard those duties and obligations as having priority over the duties and obligations you owe to any other secular organization when they are in conflict:.....

21. Give the names and post office addresses of two persons who have present knowledge of your present bona fide residence at the place as stated by you:.....

.....

.....

O A T H

STATE OF ALABAMA COUNTY

Before me, , a registrar in and for said county and state, personally appeared , an applicant for registration as an elector, who being by me first duly sworn deposes and says: I do solemnly swear (or affirm) that the foregoing answers to the interrogatories are true and correct to the best of my knowledge, information and belief. I do further solemnly swear (or affirm) that I will support and defend the Constitution of the United States and the Constitution of the State of Alabama; that I do not believe in nor am I affiliated with, nor have I been in the past affiliated with any group or party which advocated or advocates the overthrow of the government of the United States or of the State of Alabama by unlawful means.

Sworn to and subscribed before me in the presence of the Board of Registrars this the day of , 19 .

Member of the Board of Registrars for County

SUPPLEMENTAL APPLICATION FOR REGISTRATION, AND OATH

STATE OF ALABAMA COUNTY

Before the Board of Registrars in and for said State and County, personally appeared

, an applicant for registration who being by me, (Full name of applicant)

, a member of said Board, first duly sworn as follows: "I do solemnly swear (or affirm) that in the matter of the application of for registration as an elector, I will speak the truth, the whole truth, and nothing but the truth, so help me God," testifies as follows:

My name is, and I have heretofore executed the "Application for Registration, Questionnaire and Oath" submitted to me by the above-named Board of Registrars.

In addition to the information given on said "Application for Registration, Questionnaire and Oath," I depose and state as follows:

1. I was previously registered in the following State and County in the years named

(If applicant has never been registered in Alabama or any other state, he should so indicate.)

2. I have never been convicted of any offense disqualifying me from registering.

(Board should call applicant's attention to Section 182, Constitution, and Title 17, Section 15, Code of Alabama 1940. If applicant cannot make foregoing statement, facts shall be ascertained and registration refused, unless fully pardoned and right to vote restored.)

3. My present place of employment is

4. I know of nothing that would disqualify me from being registered at this time.

REMARKS

(Signed) (Name of Applicant)

Sworn to and subscribed before me this the day of , 19 .

(Member of County Board of Registrars)

ACTION OF THE BOARD

STATE OF ALABAMA.....COUNTY

Before the Board of Registrars in session in and for said State and County personally appeared.....
(Name of Applicant)

who executed the foregoing application in the manner and form therein stated. The Board having further examined said applicant under oath, touching his qualifications under Section 181, Constitution of Alabama, 1901, as amended, and having fully considered the foregoing Application for Registration, Questionnaire, and Oath, and Supplemental Application for Registration, and Oath as executed, adjudges said applicant entitled to be registered and he was duly registered on this the..... day of....., 19....., in..... precinct (or ward) in said county.

(Signed).....
Chairman

(Signed).....
Member

(Signed).....
Member

(Note: The act of actually determining an applicant entitled to be registered is judicial. A majority of the Board must concur. A majority must be present. The power cannot be delegated. Each member present must vote on each application. Not until this is done may a certificate be issued the applicant.)

EXAMINATION OF SUPPORTING WITNESS

STATE OF ALABAMA.....COUNTY

Before the County Board of Registrars in and for said State and County personally appeared

....., who being first duly sworn as follows: "I solemnly swear
(Name of Witness)
(or affirm) that in the matter of the application of..... for registration
as an elector, I will speak the truth, the whole truth, and nothing but the truth, so help me God," testifies as follows:

My name is....., My occupation is....., I reside at
....., My place of business or employment is at.....

The name of my employer is..... I am a duly registered, qualified elector in.....
precinct (or ward) in..... County in the State of Alabama. I have known the applicant

..... for..... years (or months). He is a bona fide resident at
(Give Applicant's name)

..... and to my knowledge has resided thereat for the past..... years (or
months). I know of no reason why he is disqualified from registering under the Constitution and laws of Alabama enacted in
pursuance thereof.

Space for further remarks

(Signed).....

Sworn to and subscribed before me in the presence of the Board of Registrars this the..... day of....., 19.....

(Signed).....
(Member of the Board)

Note: This application blank, when duly executed, on the final preparation of the "lists" of persons registered, must be delivered by the Board of Registrars to the Probate Judge of the County, whose duty it is to safely preserve it and all accompanying papers. See Title 41, Section 141, Code of Alabama, 1940.

APPLICATION FOR REGISTRATION, QUESTIONNAIRE AND OATHS

PART I

(This is to be filled in by a member of the Board of Registrars or a duly authorized clerk of the board. If applicant is a married woman, she must state given name by which she is known, maiden surname, and married surname, which shall be recorded as her full name.)

Full Name: Last First Middle

Date of Birth: Sex Race

Residence Address:

Mailing Address:

Voting Place: Precinct Ward District

Length of Residence: In State County

Precinct, ward or district

Are you a member of the Armed Forces?

Are you the wife of a member of the Armed Forces?

Are you a college student? If so, where

Have you ever been registered to vote in any other state or in any other county in Alabama? If so, when and in what state and county and, if in Alabama, at what place did you vote in such county?

Highest grade, 1 to 12, completed Where

Years college completed Where

PART II

(To be filled in by the applicant in the presence of the Board of Registrars without assistance.)

I, _____, do hereby apply to the Board of Registrars of _____ County, State of Alabama, to register as an elector under the Constitution and laws of the State of Alabama and do hereby submit my answers to the interrogatories propounded to me by the board.

(Signature of Applicant)

1. Are you a citizen of the United States?

2. Where were you born?

3. If you are a naturalized citizen, give number appearing on your naturalization papers and date of issuance

4. Have you ever been married? If so, give the name, residence and place of birth of your husband or wife

Are you divorced?

5. List the places you have lived the past five years, giving town or county and state
6. Have you ever been known by any name other than the one appearing on this application? If so, state what name
7. Are you employed?..... If so, state by whom. (If you are self-employed, state this.)
8. Give the address of your present place of employment
9. If, in the past five years, you have been employed by an employer other than your present employer, give name of all employers and cities and states in which you worked
10. Has your name ever been stricken for any reason from any list of persons registered to vote?..... If so, where, when, and why?
11. Have you previously applied for and been denied registration as a voter?..... If so, when and where?
12. Have you ever served in the Armed Forces?..... If so, give dates, branch of service, and serial number
13. Have you ever been dishonorably discharged from military service?.....
14. Have you ever been declared legally insane?..... If so, give details
15. Give names and addresses of two persons who know you and can verify the statements made above by you relative to your residence in this state, county and precinct, ward or district
16. Have you ever seen a copy of this registration application form before receiving this copy today?..... If so, when and where?
17. Have you ever been convicted of any offense or paid any fine for violation of the law?..... (Yes or No) If so, give the following information concerning each fine or conviction; charge, in what court tried, fine imposed, sentence, and, if paroled, state when, and if pardoned, state when. (If fine is for traffic violation only, you need write below only the words "traffic violation only.")

(Remainder of this form is to be filled out only as directed by an individual member of the Board of Registrars.)

PART III

Part III of this questionnaire shall consist of one of the forms which are Insert Part III as herein below set out. The insert shall be fastened to the questionnaire. The questions set out on the insert shall be answered according to the instructions therein set out. Each applicant shall demonstrate ability to read and write as required by the Constitution of Alabama, as amended, and no person shall be considered to have completed this application, nor shall the name of any applicant be entered upon the list of registered voters of any county until after such Inserted Part III of the questionnaire has been satisfactorily completed and signed by the applicant.

INSERT PART III (1)

(The following questions shall be answered by the applicant without assistance.)

- 1. What city is the capital of the United States?
- 2. How many states are there in the United States?
- 3. How many senators from each state are in the United States Senate?
- 4. The president of the United States is elected for a term of how many years?

INSTRUCTIONS "A"

The applicant will complete the remainder of this questionnaire before a Board member and at his instructions. The Board member shall have the applicant read any one or more of the following excerpts from the U. S. Constitution using a duplicate form of this Insert Part III. The Board member shall keep in his possession the application with its inserted Part III and shall mark thereon the words missed in reading by the applicant.

EXCERPTS FROM THE CONSTITUTION

- 1. "The powers not delegated to the United States by the Constitution, nor prohibited by it to the states, are reserved to the states respectively, or to the people."
- 2. "The judicial power of the United States shall not be construed to extend to any suit in law or equity, commenced or prosecuted against one of the United States by citizens of another state, or by citizens or subjects of any foreign state."
- 3. "Representatives shall be apportioned among the several states according to their respective numbers, counting the whole number of persons in each state, excluding Indians not taxed."
- 4. "The congress shall have power to lay and collect taxes on incomes, from whatever source derived, without apportionment among the several states, and without regard to any census or enumeration."

INSTRUCTIONS "B"

The Board member shall then have the applicant write several words, or more if necessary to make a judicial determination of his ability to write. The writing shall be placed below so that it becomes a part of the application. If the writing is illegible, the Board member shall write in parentheses beneath the writing the words the applicant was asked to write.

HAVE APPLICANT WRITE HERE, DICTATING WORDS FROM THE CONSTITUTION.

.....

.....

.....

Signature of Applicant:.....

PLEASE INSERT PART III HERE

PART IV

OATHS

STATE OF ALABAMA

_____ COUNTY

Before me, _____
a registrar in and for said county and state, personally appeared _____,
an applicant for registration as an elector, who being first duly sworn deposes and says:

"I do solemnly swear (or affirm) that the foregoing answers to the interrogatories are true and correct to the best of my knowledge, information and belief. I do further personally swear (or affirm) that I will support and defend the Constitution of the United States and the Constitution of the State of Alabama; that I do not believe in nor am I affiliated with any group or party which advocated or advocates the overthrow of the United States or the State of Alabama by unlawful means. I do further solemnly swear (or affirm) that in the matter of this application for registration I have spoken the truth, the whole truth and nothing but the truth, so help me God."

(Signature of Applicant)

Sworn to and subscribed before me this the _____ day of _____, 19____.

(Signature of Board Member)

EXPLANATION AND REMARKS

(Board members interviewing applicants may place here any special explanations, such as of residence status, or other remarks for purposes of clarification. If person is blind or is otherwise physically handicapped to such an extent that he cannot fill out this application form, the circumstances are to be recorded here, along with an explanation of the method used to determine if the person is, in fact, literate and can spell words and recognize those spelled to him, or can read large block letters and words in the case of persons with sight handicaps.)

PART V
ACTION OF THE BOARD

STATE OF ALABAMA

_____ COUNTY

The applicant, _____, appeared before the board of registrars for said state and county in a regular session and executed the foregoing application in the manner prescribed by law. The Board, having further examined said applicant under oath, touching his qualifications under Section 181, Constitution of Alabama, as amended, and having fully considered the foregoing application for registration, questionnaire and oaths, adjudges said applicant entitled to be registered and he was duly registered this the _____ day of _____, 19_____.

Signed: _____
Chairman

Member

Member

(NOTE: The act of actually determining an applicant entitled to be registered is judicial. A majority of the Board must concur. A majority must be present. The power cannot be delegated. Each member must vote on each application. Not until this is done may a certificate be issued the applicant.)

The Applicant, _____, due to failure to meet the requirements of state law for registration as an elector, is hereby rejected on this the _____ day of _____, 19_____.

Signed: _____
Chairman

Member

Member

PART VI
EXAMINATION OF SUPPORTING WITNESS

(The witness shall be placed under oath to tell the truth, the person administering the oath being a Board member or other person authorized to administer oaths and acting under the direction of the Board.)

Name of Witness _____

Address _____

Place of Voting _____

"I have known the applicant _____ for _____ years and _____ months and I have personal knowledge that his place of residence is _____

and that he has resided in the State of Alabama at least one year and in _____ County for at least six months."

Signature of Witness

Sworn to and subscribed before me this the _____ day of _____, 19_____.

(Person Administering Oath)

Date _____

INSERT PART III (1)

INSTRUCTION "A"

Immediately after this insert has been selected, applicant shall turn it over and write on the back as instructed by the Board member. The Board member shall read aloud to the applicant, from a duplicate form of this Insert Part III, one or more of the excerpts from the Constitution which appear below, and the applicant shall write on the back hereof that part of the Constitution which is thus read to him. This shall be done before applicant completes any other part of the insert. Applicant is not to be allowed to copy, from the insert or elsewhere, that part of the Constitution which is read to him, but shall write the words read to the applicant by the Board member.

INSTRUCTION "B"

(After complying with Instruction "A," applicant will complete remainder of insert. Applicant shall answer the following questions in writing and without assistance:)

1. A proposed change in the state constitution is called a proposed _____
2. Which of the following is a right guaranteed by the bill of rights?
_____public education
_____employment
_____voting
_____trial by jury
3. Name one person now a member of the governing body of this county. _____
4. The federal census of population is taken each five years. (True or False) _____

EXCERPTS FROM THE CONSTITUTION

Part 1. In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the state and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense.

Part 2. The right of citizens of the United States to vote shall not be denied or abridged by the United States or by any state on account of sex.

Congress shall have power to enforce this article by appropriate legislation.

Part 3. The terms of the President and Vice President shall end at noon on the 20th day of January, and the terms of Senators and Representatives at noon on the 3d day of January, of the years in which such terms would have ended if this article had not been ratified; and the terms of their successors shall then begin.

Part 4. The congress shall have power:

To make rules for the government and regulation of the land and naval forces.

INSTRUCTION "C"

(After applicant has read, not aloud, the foregoing excerpts from the Constitution, he will answer the following questions in writing and without assistance:)

1. If a person is indicted for a crime, name two rights which he has. _____
2. Who, if otherwise qualified, was given the right to vote by passage of the amendment shown in Part 2, above? _____

3. A United States Senator elected at the general election in November takes office the following year on what date? _____

4. A President elected at the general election in November takes office the following year on what date? _____

I hereby certify that I have received no assistance in the completion of this citizenship and literacy test, that I was allowed the time I desired to complete it, and that I waive any right existing to demand a copy of same. (If for any reason the applicant does not wish to sign this, he must discuss the matter with the board of registrars.)

Signed: _____
(Applicant)

APPENDIX E

DESCRIPTION OF EXHIBITS

This table sets forth a description of exhibits offered in evidence. All are admitted in evidence except as indicated:

A. Plaintiff's Exhibits

<u>Exhibit No.</u>	<u>Description of Exhibit</u>
Pl. Ex. 1 Not Admitted	Forty-three original application forms filed with the Dallas County Board of Registrars on September 8 and September 21, 1964, consisting of: <div style="margin-left: 400px;">White Accepted - 16 White Rejected - 4 White Pending - 14 Negro Pending - 9</div>
Pl. Ex. 2	One hundred blank insert sheets received by the Board of Registrars from the Secretary of State of Alabama and used as Part III of the application form beginning September 8, 1964. Each of the insert sheets is different in its contents, although some questions appear on more than one sheet. A sample insert sheet is included in this Brief as Appendix D. III.
Pl. Ex. 3	Key answers to the Inserts Part III described above as Pl. Ex. 2, contained in a binder notebook. This exhibit contains no indication as to who prepared or who published the

answers and does not indicate from whom the Board received the answers, but the exhibit was produced by the defendants at the hearing on October 5, 1964.

Pl. Ex. 4 - Pages E1 through E172:

Copy of the Minutes of the Board of Registrars, March 7, 1962 - August 17, 1964, containing:

- (1) The name, address, and race of each applicant for each registration day,
- (2) The action of the Board on each application,
- (3) A record of questions to be asked of applicants,
- (4) A record of other business transacted by the Board and of various official communications to and from the Board.

List of names of applicants and the results of investigation as to the criminal conviction record of each applicant used by the Board of Registrars, February 21, 1962 - August 18, 1964.

Pl. Ex. 5 - Pages N2 through N82:

Copy of the log used by the Board of Registrars to record the signature, address, race, and time of application for each applicant, June 3, 1963 - November 20, 1963.

Miscellaneous papers and correspondence of the Board of Registrars.

Pl. Ex. 6 Application forms filed May 7, 1962 - August 17, 1964, with the Board of Registrars, arranged in four groups:

A	2-95	Negro Accepted
B	1-679A	Negro Rejected
C	1-948	White Rejected
D	1-283	White Rejected

Pl. Ex. 7 Blank application forms used by the Board of Registrars:

- (1) Four-page form used between May 5, 1962, and February 16, 1964. Questions one through 21 appear in a standard sequence on this sample form, although on the application forms used by the Board of Registrars during this period the sequence of the questions and the number assigned to the questions varies from form to form. A copy of this form is included in this Brief as Appendix D. I.
- (2) Parts I, II, IV, V, and VI of the six-part form used beginning February 17, 1964, together with the first of seven monthly Part III inserts used from February 17, 1964 through August 17, 1964. A copy of this form is included in this Brief as Appendix D. II.

Pl. Ex. 8 Alabama Legislation and Supreme Court Orders relating to voter registration:

- (1) Act No. 92, Regular Session, 1961, instructing the Legislative Reference

Service, on request of the Chief Justice of the Supreme Court of Alabama, to prepare for approval by the Supreme Court at least 12 sets of questions so that a different questionnaire may be filed with the Secretary of State once each month for use by the several boards of registrars.

- (2) Act No. 320, Special Session, 1961, creating the state board of examiners for voter registration and prescribing its powers and duties. This Act never took effect, because it was to implement a constitutional amendment which was not adopted.
- (3) Act No. 253, Special Session, 1964, providing additional meeting days for boards of registrar s under certain conditions and authorizing county governing bodies to provide supplies and clerical assistance; the additional meeting days, not to exceed 50 in any calendar year, to be used only for the purpose of reviewing records, correcting records, purging or re-registration.
- (4) Order dated January 14, 1964 supplementing the Order of the Supreme Court of Alabama promulgating and adopting

the Application for Registration, Questionnaire and Oath dated March 29, 1960. The Supplemental Order sets out a six-part application form, including twelve different Part III Inserts, and provides that a different Part III Insert shall be used each month.

- (5) Order dated March 29, 1960 supplementing the Order of the Supreme Court of Alabama promulgating and adopting the Application for Registration, Questionnaire and Oath dated January 16, 1952. This Supplemental Order provides that the registration adopted in 1952 be printed in 20 different arrangements so that the text of the questions numbered "2" through "21" appear in varying order.
- (6) Order dated August 26, 1964 supplementing the Order of the Supreme Court of Alabama promulgating and adopting the Application for Registration, Questionnaire and Oath dated January 14, 1964. This Supplemental Order provides that 100 different inserts instead of twelve different inserts be used as Part III of the registration questionnaire and that applicants select at random which of the 100 inserts is to constitute Part III of his application form.

- Pl. Ex. 9 Letter from Leslie Hall, Alabama Assistant Attorney General, to Victor Atkins, chairman, Dallas County Board of Registrars, dated November 7, 1963, concerning the November 1, 1963, Order of this Court in this case. The letter explains that Section 181 of the Constitution of Alabama, 1901, as amended by Amendment 91, does not provide that the questionnaire shall be used as an examination or test, but provides that it is to be used in order to aid the members of the boards of registrars in judicially determining whether applicants are qualified. The letter also invites attention to the Opinion of the Fifth Circuit Court of Appeals in this case rendered October 3, 1963, and indicates that a copy of the opinion has been enclosed with the letter with portions of the Opinion marked for attention.
- Pl. Ex. 10 "Standards and Procedures for Grading and other Decisions on Applications." from Minutes of the Board of Registrars for September 8, 1964.
- Pl. Ex. 11 Memorandum from the Alabama State Sovereignty Commission to Boards of Registrars giving suggestions on the use of the new insert Part III, dated September 19, 1964 and signed by Martha Witt Smith.

Pl. Ex. 12 Signatures of persons presenting themselves to register to vote, in the order they presented themselves, maintained by the Dallas County Sheriff's Department, for the following days:

May 18, 1964	July 8, 1964
July 6, 1964	July 9, 1964
July 7, 1964	July 10, 1964

Pl. Ex. 13 Letter from Leslie Hall to Victor Atkins dated November 5, 1963, referring to the November 1, 1963 Order of this Court in this case, containing a hand-written reply by Victor Atkins asking for advice concerning the Order.

Pl. Ex. 14 Letter to Matthew Jackson, Sr., dated June 17, 1963, from the Dallas County Board of Registrars. The letter states that through error the notation "Police Record" was placed on a "Notice of Rejection" forwarded to Jackson and dated June 3, 1963. The letter explains that in checking records the error was found and corrected, but that the notice in question still states ample reason for rejection and that Jackson stands rejected. Five Notices of Rejection mailed to Matthew Jackson by the Dallas County Board of Registrars bearing the following dates:

August 19, 1963	April 20, 1964
November 4, 1963	July 6, 1964
January 27, 1964	July 6, 1964

Each of the Notices indicates that Jackson failed to answer correctly one or more pertinent questions.

Pl. Ex. 15
Not Admitted

Copy of accepted application form of Lewis Evans, a white person, dated November 14, 1960.

Pl. Ex. 16

144 photographs of voter registration lines at Dallas County Courthouse October-November, 1963, identified by Special Agent Riley of the Federal Bureau of Investigation to be fair and accurate representations of the registration line on the days he observed it.

Pl. Ex. 17

92 photographs of voter registration lines at Dallas County Courthouse October-November, 1963, taken by Special Agent Van Lancker of the Federal Bureau of Investigation.

Copy of a Letterhead Memorandum from the Mobile, Alabama, office of the Federal Bureau of Investigation, dated October 23, 1963, identifying 57 photographs as those taken by Special Agent Van Lancker of the Voter registration lines at the Dallas County Courthouse on October 15, 1963.

Copy of a Letterhead Memorandum from the Mobile, Alabama, office of the Federal Bureau of Investigation, dated October 28, 1963, identifying 35 photographs as those taken by Special Agent Van Lancker of the voter registration lines at the Dallas County Courthouse on October 15, 1963.

- Pl. Ex. 18 Selma Times-Journal, November 18, 1963, containing on page nine a legal notice announcing the times and places at which the Dallas County Board of Registrars would receive applications for registration at each precinct during October and November, 1963.
- Pl. Ex. 19 Minute Book of the Board of Registrars labelled "May 7, 1962 to _____." (sic). This Minute Book is also included in Pl. Ex. 4.
- Pl. Ex. A Sixty-five original application forms of white persons accepted by the Board of Registrars since May 7, 1962, submitted as a group. Each contains changed answers or differences in the pen or ink used to complete the questionnaire.
- Pl. Ex. B Biennial Reports (1899 - 1908) and Annual Reports (1909 - 1962) of the Alabama Department of Education, including such information as:
- (1) Census of school age children, by race,
 - (2) Percentage enrollment of school age children, by race,
 - (3) Percentage of enrollment transported to and from school, by race,
 - (4) Ratio of students per teacher in Negro and white schools,
 - (5) Average annual salary for teachers in Negro and white schools,
 - (6) Qualifications of teachers in Negro and white schools,

- (7) Annual expenditures per student for
Negro and white schools.

B. Defendant's Exhibits

Def. Ex. 1 Four pages from the Minutes of the Board of
Registrars:

- (1) One page recording the business transacted by the Board May 7, May 14, and June 4, 1962,
- (2) One page recording the business transacted by the Board June 18, July 2, and part of the business transacted on July 16, 1962,
- (3) Two pages containing a list of questions, most of which concern the United States Constitution. Opposite the questions or groups of questions are dates falling between May, 1962 and October 28, 1963.