

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. _____
)	
)	<u>COMPLAINT</u>
WINNICE J. P. CLEMENT,)	
REGISTRAR OF VOTERS OF)	
WEBSTER PARISH, LOUISIANA,)	
AND THE STATE OF LOUISIANA,)	
)	
Defendants.)	
_____)	

The United States of America alleges that:

1. This action is instituted by the Attorney General in the name of the United States pursuant to the provisions of 42 U. S. C. 1971, as amended.
2. This Court has jurisdiction of this action under 42 U. S. C. 1971(d) and 28 U. S. C. 1345.
3. The State of Louisiana is joined as a party defendant pursuant to 42 U. S. C. 1971(c).
4. Defendant Winnice J. P. Clement (hereinafter referred to as defendant registrar) is, and has been since 1940, the Registrar of Voters of Webster Parish, Louisiana. She resides in Minden, Louisiana.

5. Defendant registrar is an official and agent of the defendant State of Louisiana.

6. Under Louisiana law, it is the duty of the defendant registrar to receive and pass upon applications for registration to vote in Webster Parish and to determine whether each applicant is qualified to register to vote.

7. Under Louisiana law registration is a prerequisite to voting in any election.

8. In Webster Parish, Louisiana, registration is periodic; every four years persons desiring to vote must reregister. A new registration period began in Webster Parish on January 1, 1957; the current registration period began on January 1, 1961.

9. In Webster Parish, Louisiana, there are approximately 15,713 white persons and 7,045 Negroes of voting age. The number of persons of each race registered to vote as of the specified dates are as follows:

	<u>Whites</u>	<u>Negroes</u>
October 30, 1956	12,957	1,773
December 31, 1960	12,250	130
November 30, 1962	8,448	113

10. Since September 1962 the defendant registrar has, in addition to other requirements, required applicants for registration to answer correctly four of six multiple-choice questions on history and government, the forms for which test are supplied by the Louisiana State Board of Registration, an agency of the defendant State. This test was not administered to persons who became registered to vote in Webster Parish prior to the adoption of the test and who are still registered to vote in that parish.

11. Pursuant to a pattern and practice of racial discrimination the defendants have deprived and are depriving Negro citizens in Webster Parish, who are otherwise qualified to vote, of the right secured by 42 U. S. C. 1971(a) to be entitled and allowed to vote without distinction of race or color by engaging in racially discriminatory acts and practices which include, but are not limited to, the following:

(a) applying different and more stringent requirements, procedures, and standards to Negro applicants than to white applicants in determining whether such applicants are qualified to register to vote in Webster Parish;

(b) rejecting Negro applicants for voter registration in Webster Parish who are qualified by the standards applied to white applicants;

(c) adopting and strictly applying the test described in paragraph 10, above, thereby subjecting applicants for registration to a higher standard than had ordinarily been applied to persons who registered to vote in Webster Parish prior to its adoption, 98.8% of whom are white persons.

12. The defendants will, unless restrained by order of this Court, continue to engage in the discriminatory acts and practices set forth in this Complaint.

WHEREFORE, plaintiff prays:

1. That this Court make a finding that the acts and practices engaged in by the defendants, as described in this Complaint, constitute deprivations of the right secured by 42 U. S. C. 1971(a), and that these deprivations were and are pursuant to a pattern and practice of racial discrimination in Webster Parish, Louisiana.

2. That this Court issue a permanent injunction enjoining the defendants, their officers, agents, employees, and successors, and all persons acting in concert with them from:

(a) Engaging in any act which would deprive any citizen in Webster Parish of the right to register and the right to vote without distinction of race or color.

(b) Adopting or applying to Negro applicants for registration different and more stringent requirements, procedures, and standards than those applied to white applicants for registration in determining whether such applicants are qualified to register to vote in Webster Parish.

(c) Applying to Negro applicants for registration to vote in Webster Parish any test or requirement which imposes a higher standard than the standard applied to white voters who registered prior to the adoption of any such test or requirement.

3. That this Court issue an appropriate order which will insure the fair, equal, and non-discriminatory operation of the office of the Registrar of Voters of Webster Parish, Louisiana.

4. That this Court grant such additional relief as justice may require together with the costs and disbursements of this action.

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