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[fol. 850] ANSWER TO INTERROGATORY NUMBER 2(B) AS TO THE NAME AND OFFICIAL CAPACITY, IF ANY, OF EACH PERSON WHO THE UNITED STATES CLAIMS WAS MOTIVATED BY A PURPOSE TO RESTRICT THE NEGRO FRANCHISE AND TO ESTABLISH AND PERPETUATE WHITE POLITICAL SUPREMACY AND RACIAL SEGREGATION AND THE SPECIFIC MANNER OR MEANS BY WHICH SUCH PURPOSE WAS EXECUTED OR PUT INTO EFFECT.

The name and official capacity of each person who was motivated by this purpose and the specific manner or means by which such purpose was executed or put into effect are as follows:

- | | |
|------------------|--|
| S. S. Calhoon, | —President of the Constitutional Convention, delegate from Hinds County, Attorney and Judge. |
| J. L. Alcorn, | —delegate from Coahoma County, and Attorney. |
| B. H. Allen, | —delegate from Tishomingo County. |
| A. Arrington, | —delegate from Jones County and member of the Mississippi House of Representatives. |
| Jno. A. Bailey, | —delegate from Lauderdale County. |
| Jno. R. Baird, | —delegate from Sunflower County. |
| W. L. Bassett, | —delegate from Neshoba County. |
| Thos. P. Bell, | —delegate from Kemper County, and Attorney. |
| Jas. R. Binford, | —delegate from Montgomery County. |
| H. I. Bird, | —delegate from Lawrence County. |
| W. A. Boyd, | —delegate from Tippah County. |
| D. Bunch, | —delegate from Yazoo County. |
| R. B. Campbell, | —delegate from Washington County. |
| J. P. Carter, | —delegate from Perry County. |
| J. B. Chrisman, | —delegate from Lincoln County and Judge of Circuit Court of Mississippi, Seventh District. |

- R. A. Dean, —delegate from Lafayette County
and member of Mississippi Sen-
ate.
- [fol. 851]
- W. M. Denny, —delegate from Jackson County.
Geo. G. Dillar, —delegate for Noxubee County
and member of Mississippi Sen-
ate.
- Geo. L. Donald, —delegate from Clarke County
and Sheriff of Clarke County.
- G. W. Dyer, —delegate from Panola County.
Jas. W. Edwards, —delegate from Lowndes County.
Wm. S. Farish, —delegate from Issaquena Coun-
ty and District Attorney of Mis-
sissippi, Fourth District.
- D. S. Fearing, —delegate from Hinds County.
J. W. Fewell, —delegate for State-at-Large.
Geo. J. Finley, —delegate from Marshall County.
J. D. Fontaine, —delegate from Pontotoc County.
T. S. Ford, —delegate for State-at-Large.
J. Z. George, —delegate for State-at-Large and
Senator in the United States
Congress.
- F. M. Glass, —delegate from Attala County.
N. D. Guerry, —delegate from Lowndes County.
A. B. Guynes, —delegate from Copish County.
D. T. Guyton, —delegate from Attala County.
F. M. Hamblett, —delegate from Quitman County.
J. G. Hamilton, —delegate from Holmes and Ya-
zoo Counties.
- T. L. Hannan, —delegate from Choctaw County.
W. P. Harris, —delegate from Hinds County.
T. T. Hart, —delegate from Hinds County.
N. C. Hathorn, —delegate from Covington Coun-
ty.
- Jno. Henderson, —delegate from Clay County.
Elliot Henderson, —delegate from Harrison County.
P. Henry, —delegate for State-at-Large and
member of the Mississippi Sen-
ate.
- C. K. Holland, —delegate from Calhoun County.

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- H. S. Hooker,** —delegate from Holmes County.
R. G. Hudson, —delegate for State-at-Large.
Thos. D. Isom, —delegate from Lafayette County.
J. H. Jamison, —delegate from Noxubee County.
D. S. Johnson, —delegate from Chickasaw County.

J. H. Jones, —delegate for State-at-Large and member of the Mississippi Senate.

Walter L. Keirn, —delegate from Holmes County and Levee Commissioner for Holmes County.

James Kennedy, —delegate from Clay County.
J. Kittrell, —delegate from Green County.
W. J. Lacey, —delegate from Chickasaw County.

R. C. Lee, —delegate from Madison County.
S. D. Lee, —delegate from Oktibbeha County and President of Mississippi Agriculture and Mechanical College.

T. P. Lee, —delegate from Yazoo County.
Geo. H. Lester, —delegate from Yalobusha County.

W. F. Love, —delegate from Amite County.
E. J. Marett, —delegate from Marshall County.
Edward Mayes, —delegate for State-at-Large and Chancellor of the Univeristy of Mississippi.

Monroe McClurg, —delegate from Carrol County.
Will T. McDonald, —delegate from Benton County and member of the Mississippi Senate.

F. J. McDonnell, —delegate from Monroe County.
J. H. McGehee, —delegate from Franklin County.
G. T. McGehee, —delegate from Wilkinson County.

F. A. McLain, —delegate from Amite and Pike Counties.

Wm. C. McLean, —delegate from Grenada County.
J. S. McNeily, —delegate for State-at-Large.

[fol. 853]

Issiah T. Montgomery,—delegate from Bolivar County,
Jordon L. Morris, —delegate from Wayne County.
H. L. Muldrow, —delegate for State-at-Large.
J. R. Murff, —delegate from Monroe County.
T. V. Noland, —delegate from Wilkinson County
 and member of Mississippi
 House of Representatives.

J. W. Odom, —delegate from DeSoto County.
S. E. Packwood, —delegate from Pike County.
J. K. P. Palmer, —delegate from Scott County.
A. J. Paxton, —delegate from Washington
 County.

C. O. Potter, —delegate from Union and Ponto-
 toc Counties.

Sam Powel, —delegate from DeSoto County.
J. R. Puryear, —delegate from Tate County and
 member of Mississippi House of
 Representatives.

Chas K. Regan, —delegate from Claiborne County.
L. P. Reynolds, —delegate from Alcorn County.
L. I. Rhodes, —delegate from Lee County.
W. C. Richards, —delegate from Lowndes County.
S. W. Robinson, —delegate from Rankin County.
J. P. Robinson, —delegate from Union County.
J. J. Rotenberry, —delegate from Yalobusha Coun-
 ty.

J. S. Sexton, —delegate for State-at-Large.
Jno. M. Simonton, —delegate from Lee County.
H. F. Simrall, —delegate from Warren County.
Murray F. Smith, —delegate from Warren County.
W. F. Spence, —delegate from Hancock County.
H. M. Street, —delegate from Dauderdale Coun-
 ty and member of the Missis-
 sippi House of Representatives.

[fol. 854]

T. W. Sullivan, —delegate from Carroll County
 and member of Mississippi
 House of Representatives.

E. O. Sykes, —delegate from Monroe County.

- Allen Talbot, —delegate from Benton and Tip-
pah Counties and member of the
Mississippi House of Repre-
sentatives.
- R. H. Taylor, —delegate from Panola County.
- R. H. Thompson, —delegate from Lincoln and Jef-
ferson Counties.
- Steve H. Turner, —delegate from Itawamba County.
- T. S. Ward, —delegate from Madison County.
- Olivar C. Watson, —delegate from Winston County.
- W. C. Wilkinson, —delegate from Copiah County.
- Frank K. Winchester, —delegate from Adams County.
- Wm. D. Witherspoon, —delegate from Lauderdale,
Kemp, and Clarke Counties and
member of the Mississippi
House of Representatives.
- W. P. Wyatt, —delegate from Tate County.

Each of the 104 delegates named in the preceding list was motivated by the purpose of restricting the Negro franchise and of establishing and perpetuating white political supremacy and racial segregation in Mississippi to the extent that each of them voted in favor of adopting the Constitution of 1890.¹

The vote of each of these delegates for the adoption of the Mississippi Constitution was the specific manner and means by which such purpose was executed.

¹ P90-59. *Journal of the Proceedings of the Constitutional Convention of the State of Mississippi* (Jackson, Mississippi: B. L. Martin, 1890), pp. 637-638.

[fol. 855] ANSWER TO INTERROGATORY NUMBER 4 (B) AND (C) AS TO THE NAME AND OFFICIAL CAPACITY, IF ANY, OF EACH PERSON WHO THE UNITED STATES CLAIMS DESIGNED SECTION 244 OF THE MISSISSIPPI CONSTITUTION OF 1890 TO ACCOMPLISH THE PURPOSE OF RESTRICTING THE NEGRO FRANCHISE AND ESTABLISHING AND PERPETUATING WHITE POLITICAL SUPREMACY AND RACIAL SEGREGATION IN MISSISSIPPI, AND AS TO THE PARTICULAR MEANS OR MANNER BY WHICH THIS DESIGN WAS ACCOMPLISHED OR PUT INTO EFFECT.

The name and official capacity, if any, of each person who the United States claims designed Section 244 of the Mississippi Constitution of 1890 to accomplish the purpose of restricting the Negro franchise and establishing and perpetuating white political supremacy and racial segregation in Mississippi are as follows:

R. C. Patty
 Z. B. George
 W. T. Martin
 Sam Powel
 R. G. Hudson
 G. H. Lester
 W. C. Richards
 J. A. Blair
 J. S. McNeily
 J. B. Boothe
 J. M. Simonton
 J. M. Street
 R. A. Dean
 Monroe McClurg
 H. S. Hooker
 W. H. Morgan
 G. T. McGehee
 J. R. Binford
 T. P. Bell
 J. R. Puryear
 L. P. Reynolds
 C. K. Regan

One of the duties of the Committee on Elective Franchise, Apportionment, and Elections was to draw up the qualifications for electors in Mississippi. The proposal made by this committee regarding voter qualifications was adopted

by the Convention,¹ and the proposal became Article XII, Section 244, of the Mississippi Constitution of 1890.

[fol. 856] Each of the persons named in the preceding list was a member of the Franchise Committee who voted in favor of adopting Section 244 of the Mississippi Constitution.

The vote cast by each of these persons in favor of adoption of Section 244 was the particular means by which the design of restricting the negro franchise and establishing and perpetuating white political supremacy and racial segregation in Mississippi was accomplished.

[fol. 857] ANSWER TO INTERROGATORY NUMBER 7 AS TO THE FACTUAL BASIS FOR THE ASSERTION AND ALLEGATIONS MADE IN PARAGRAPH 21 OF THE COMPLAINT THAT DURING THE PERIOD FROM 1899 TO APPROXIMATELY 1952, WHITE POLITICAL SUPREMACY IN MISSISSIPPI WAS MAINTAINED AND PROMOTED BY THREE METHODS AMONG OTHERS: NEGROES WERE NOT ALLOWED TO REGISTER; TO VOTE; LITERATE NEGROES WERE REQUIRED TO INTERPRET SECTIONS OF THE MISSISSIPPI CONSTITUTION; NEGROES WERE EXCLUDED FROM DEMOCRATIC PRIMARY ELECTIONS.

The factual basis for the assertion and allegations made in Paragraph 21 of the Complaint that during the period from 1899 to approximately 1952, white political supremacy in Mississippi was maintained and promoted by three methods among others is as follows:

I. Statements By Negroes Who Were Not Allowed to Register to Vote

Appendix A includes record of the experiences of Negroes who were refused registration in Mississippi counties during the period from 1890 through 1955.

[fol. 858] II. Statistics for the Period 1890 Through 1952

In 1899 there were approximately 140,000 registered voters in Mississippi. Of this total approximately 18,000 or

¹ P 90-58, *Journal of the Proceedings of the Constitutional Convention of the State of Mississippi*. (Jackson, Miss. E. L. Martin, 1890), P. 269-270.