

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA )
Plaintiff, )
v. )
IKE BROWN, individually, and in his )
official capacities as Chairman of Noxubee )
County Democratic Executive Committee )
and Superintendent of Democratic Primary )
Elections; NOXUBEE COUNTY )
DEMOCRATIC EXECUTIVE )
COMMITTEE; CARL MICKENS, )
individually, and in his official capacities )
as the Circuit Clerk of Noxubee County, )
Superintendent of Elections, Administrator )
of absentee ballots and Registrar of voters; )
the NOXUBEE COUNTY ELECTION )
COMMISSION; NOXUBEE COUNTY, )
MISSISSIPPI; and those acting in concert, )
Defendants. )

CIVIL ACTION NO. 4:05-cv-33 (TSL/AGN)

AFFIDAVIT OF IKE BROWN

Comes now the affiant, Ike Brown, pursuant to 28 U.S.C. §1746, and states the following under penalty of perjury:

- 1. I am a listed Defendant in this case.
2. Until the United States filed a motion for an injunction against me, I was not aware that Kendrick Lashawn Slaughter was a witness in this case.
3. I have not received a copy of the witness list provided by the United States in this case.
4. My attorney did not tell me the names of any witnesses on the witness list provided by the United States in this case.

5. I was not aware of the altercation between Terry Grasserree and Kendrick Slaughter on July 15, 2005 until it was reported in the local newspaper. I was not present when the alleged events took place. I did not speak with Mr Grasserree concerning this case or the witnesses in this case before or after the July 15 altercation between he and Slaughter. I was in no way involved in said altercation. I did not direct or encourage Mr. Grasserree to harass, threaten or intimidate Kendrick Slaughter. In fact, I consider Slaughter to be a good friend. I served as a reference for Slaughter when he was trying to get hired as a police officer at the Aberdeen Police Department. When I found out that Kendrick Slaughter had been arrested I tried to help him by speaking o the Sherriff on his behalf. I do not believe that Slaughter, as a police officer who deals with criminals everyday, would feel intimidated or threatened by the actions of Terry Grasserree on July 15, 2005.
6. I have never directly or indirectly harassed, threatened, or intimidated or caused to be harassed, threatened or intimidated any party or witness in this case.
7. Neither I nor the members of the Noxubee County Executive Commission have the power, authority or influence to direct or persuade Mr. Grasserree to harass, threaten or intimidate anyone. Mr. Grasserree has never worked for me. He is not a member of the Noxubee County Democratic Executive Committee. Other than knowing hum, I have no influence over him.
8. I believe that the events described in the Declaration of Kendrick LaShawn Slaughter which allegedly occurred on July 15, 2005, are due to past personal conflicts between Mr. Grasserree and Mr. Slaughter and that said personal conflict is well known throughout the Noxubee County Community.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on this the 10 day of October, 2005.

  
IKE BROWN