

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**UNITED STATES OF AMERICA**

**PLAINTIFF**

**V.**

**CAUSE NO. 4:05cv33TSL-AGN**

**IKE BROWN, et al.**

**DEFENDANTS**

**DEFENDANTS IKE BROWN AND THE NOXUBEE COUNTY  
EXECUTIVE COMMITTEE'S SUPPORTING AFFIDAVIT**

I, Ed Nave, being duly sworn, deposed and says:

1. That I am Chairman of the Kemper County Democratic Executive Committee and have had this position since 2005. I have served on the Kemper County Executive Committee for over twenty years and have also served as Secretary and Chairman of Elections for the state of Mississippi Democratic Party.
2. That to give an appointed Referee-Administrator all electoral duties and authority of the Chairman and the Executive Committee would result in severe adverse effects of the party. First, it would destroy the Democratic Party leadership and organization. The Chairman's most important role is that of Superintendent of elections and without that job, his function would be meaningless. The party would become a hollow entity that would atrophy and become so weak as to be worthless. It would take years for new leadership rebuild the party and in between that time, the lack of continuity would basically gut the party leadership and the party would lose its effectiveness. The Executive Committee would degrade into small pockets of groups and would cease to operate as a single unit. A lack of leadership would result in chaos and turmoil on the executive committee and would prevent any form of political effectiveness. There would be no participation in the party caucus meetings

and the county Democratic Party would dissolve altogether over a short period of time.

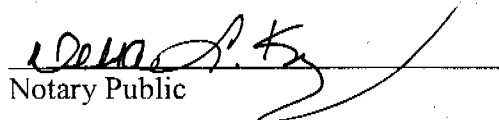
3. An appointed Referee-Administrator given all electoral duties and authority would also destroy the Democratic Party voter population. Regardless of how presented or introduced to the community, the perception would be that of Governmental law enforcement at the polls and black voters have a history of distrust of law enforcement that goes back to the 1940's. This phobia of law enforcement would be reasserted into anyone aged forty five years or older and would drastically reduce voter turnout by blacks. It would be perceived as a Republican Governmental coup to the black community and drive away voters from the election process. In fact, such an appointment would become a mechanism that would diminish the voting power of the black majority by way of intimidation and distrust. There would be a reduction in the number of voter turnout at the polls, in the number of voters participating in the absentee ballot process, and in the number of potential candidates running for office in the Democratic Party. It would create a vacuum of black voter participation in the Democratic Party.
4. That the primary election is a selection process of the Democratic Party to choose the best and strongest candidate to run in the general election against republican candidates and independents and such an appointment would absolve the democrat voters in the county of that ability. The reduction in voter turnout and support of the party would result in weaker candidates being selected by special interest groups and or more independent candidates who would not able to amass the strength of an unified democratic party to effectively compete against the republican candidates.

The end result would be that there will be no organized democratic party force to compete with republicans for local elections.

5. That the number of other volunteers, such as poll workers, would be drastically reduced as well. It is very difficult to find people to volunteer to work the polls and most of the poll workers that commit only do so because of the recruitment efforts of members of the Executive Committee. Destruction of the Executive Committee membership and organization would directly result in the destruction of the other volunteer support systems, such as poll workers and managers. A Referee-Administrator would be a neutral in a position where a partisan should operate. If he or she runs the elections, such a person would have to assume all of the functions of party leadership or allow the party leaderless.
6. That such an appointment would also result in a void of democratic campaigning for the general election. One of the executive committee's main functions after the primary election is to campaign for and increase support of their selected candidates. If the executive committee is destroyed, then the democratic candidate support system is destroyed and would provide a great advantage to the opposing republican candidate.
7. That this affidavit is executed by affiant, for the purpose of supporting Defendants Brown and the NCDEC's Opposition to Plaintiff's curative remedy of the Court appointing a Referee-Administrator that would have all electoral duties and authority of the Chairman and the Executive Committee.

  
Ed Nave

Sworn to and subscribed before me this the 13<sup>th</sup> day of August, 2007.

  
Notary Public

My Commission Expires:

