

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

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	NO. 4:05-cv-33 (TSL/LRA)
)	
IKE BROWN, et al.,)	
)	
Defendants.)	
_____)	

**UNITED STATES’ RECOMMENDATION THAT SPECIFIC MEMBERS OF THE
NOXUBEE COUNTY DEMOCRATIC EXECUTIVE COMMITTEE BE INCLUDED IN
THE COURT’S REMEDIAL ORDER**

Pursuant to this Court’s request, the United States submits the individual names of the following six Noxubee County Democratic Executive Committee (NDEC) members who have been specifically involved in the activities for which the Court found Defendants Ike Brown and the NDEC liable in the captioned case: Carrie Kate Windham, Terry Grassaree, Dorothy Clanton McCoy, Gary Naylor, Ethel May, and Billie Dickson. The United States requests that the Court specifically prohibit these individuals, along with Brown, from the election administration duties referenced in the United States Proposed Order, for the following reasons:

1. Carrie Kate Windham - The Court’s opinion included findings extensively discussing “Windham’s fraudulent absentee ballot activities in the 2003 election conducted under Brown’s leadership.” United States v. Brown, 2007 WL 1965433, *16 (S.D. Miss. 2007).
2. Terry Grassaree - The Court’s opinion found that Grassaree’s behavior towards a white poll manager and a white candidate during the 2003 election was “an egregious abuse of his authority as a law enforcement officer and as a member of the NDEC, and is troublesome, to say the least.” Id. at 24.

3. Dorothy Clanton McCoy - Clanton took charge of the Title One polling place during the 2003 election and denied poll watchers the right to challenge absentee ballots. Id. at *19. During this time, she was joined by her sister, Carrie Kate Windham. Id. Clanton also closed down efforts by poll watchers to challenge absentee ballots at the 2002 general election after she was instructed to do so by Ike Brown. Id. at *21, n. 43. She was also involved in the efforts to intimidate Nikki Halbert, one of the United States' witnesses. Id. at *13, n. 34.

4. Gary Naylor - The Court found that when white Supervisor candidate Eddie Coleman attempted to challenge absentee ballots at the Shuqualak precinct in 2003 but was thwarted by poll managers who sped through the ballots, the poll managers "continued in the same manner at the direction of Gary Naylor, who was not a manager but a member of the NDEC." Id. at *19.

5. Ethel May - At the Brooksville precinct in 2003, "Ethel May, who appeared to be in charge, along with Brown, refused to allow [Samuel Heard] to have more than one poll watcher, even though there were four tables." Id. at *20, n. 41. Although the Court ultimately found that May's treatment of a white candidate was not necessarily indicative of a racial intent, it was evident that she worked in conjunction with Brown to prevent a white candidate from having poll watchers present in a polling place.

6. Billie Dickson - Although the United States does not yet have access to the transcript of the August 22, 2007 remedial hearing, it provided extensive evidence from three witnesses that Dickson commandeered the Macon Fire Station polling place, ordering absentee ballots counted without review.

For the aforementioned reasons, the United States respectfully requests that the Court specifically enjoin these individuals from the election administration duties referenced in the United States Proposed Order.

Respectfully Submitted,
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