

APPLICATION FOR COMPLAINT

TO: THE STATE OF MICHIGAN  
CIVIL RIGHTS COMMISSION  
900 CADILLAC SQUARE BUILDING  
DETROIT 26, MICHIGAN

GEORGE W. CROCKETT, JR., AS AGENT AND ATTORNEY AT LAW FOR THE UNDERSIGNED INDIVIDUALS AND ORGANIZATIONS, ALL CITIZENS AND RESIDENTS OF WAYNE COUNTY, STATE OF MICHIGAN, HEREBY MAKES APPLICATION TO THE MICHIGAN CIVIL RIGHTS COMMISSION FOR THE ISSUANCE OF A COMPLAINT AGAINST THE OFFICE OF THE WAYNE COUNTY PROSECUTOR AND AGAINST SAMUEL OLSEN AS WAYNE COUNTY PROSECUTOR, AND IN SUPPORT OF THIS APPLICATION, SHOWS THE FOLLOWING:

1. THE FULL NAME AND ADDRESS OF THE COMPLAINANTS APPEAR ON A SEPARATE SHEET OR SHEETS APPENDED TO THIS APPLICATION. THE FULL NAME AND ADDRESS OF THE AGENT FOR THE COMPLAINANTS IS:

GEORGE W. CROCKETT, JR.  
ATTORNEY AT LAW  
CADILLAC TOWER  
DETROIT 26, MICHIGAN

2. THE FULL NAME AND ADDRESS OF THE RESPONDENT IS SAMUEL H. OLSEN, WAYNE COUNTY PROSECUTOR, WITH OFFICES LOCATED ON THE 5TH FLOOR, POLICE HEADQUARTERS BUILDING, DETROIT, MICHIGAN.
3. THE COMPLAINANTS ARE NEGROES OR ORGANIZATIONS AND INDIVIDUAL CITIZENS INTERESTED IN SECURING FOR THE NEGRO RESIDENTS OF WAYNE COUNTY, MICHIGAN, THE EQUAL PROTECTION OF THE LAWS OF MICHIGAN. THEY CHARGE THAT THE OFFICE OF THE WAYNE COUNTY PROSECUTOR, AND SAMUEL H. OLSEN, AS WAYNE COUNTY PROSECUTOR, IN THE PERFORMANCE OF HIS DUTIES AS THE COUNTY'S CHIEF LAW ENFORCEMENT OFFICER, HAS SYSTEMATICALLY DISCRIMINATED AGAINST NEGROES AND THE NEGRO POPULATION OF WAYNE COUNTY IN THE ENFORCEMENT OF THE CRIMINAL LAWS OF MICHIGAN; AND THAT SUCH DISCRIMINATION IS BECAUSE OF THEIR RACE OR COLOR.

THE FOLLOWING PARTICULARS ARE ALLEGED IN SUPPORT OF THIS CHARGE:

- A) SAMUEL H. OLSEN HAS BEEN WAYNE COUNTY PROSECUTOR SINCE 1957. DURING THIS PERIOD HE HAS CONSISTENTLY, AND WITH FEW EXCEPTIONS, EXONERATED WHITE PERSONS ACCUSED OF CRIMES OF VIOLENCE AGAINST NEGROES AND HAS REFUSED TO RECOMMEND THE ISSUANCE OF A WARRANT AND TO THUS PERMIT A JUDICIAL INVESTIGATION INTO THE QUESTION OF THE EXISTENCE OF PROBABLE CAUSE TO BELIEVE THAT A CRIME WAS COMMITTED.

- b) THE ANNUAL STATISTICAL REPORTS OF THE DETROIT POLICE DEPARTMENT, COMPILED BY THE DEPARTMENT'S RECORD BUREAU, FOR 1958, 1959, 1960 AND 1961, INDICATE THE NUMBER OF INSTANCES IN WHICH THE PROSECUTOR'S OFFICE RULED THAT A HOMICIDE WAS JUSTIFIABLE. IT DOES NOT APPEAR THAT SIMILAR RECORDS ARE AVAILABLE FOR THE PERIOD 1962 - 1965.
- c) THE ABOVE RECORDS INDICATE THAT FROM 1958 THROUGH 1961 THERE HAVE BEEN THIRTY-FOUR (34) WHITES KILLED BY NEGROES IN DETROIT. NONE OF THESE KILLINGS WAS RULED BY THE PROSECUTOR TO BE JUSTIFIABLE AND HENCE, PROSECUTION OF THE NEGRO ASSAILANT FOLLOWED. DURING THIS SAME PERIOD TWENTY-THREE (23) NEGROES WERE KILLED BY WHITES. OF THIS NUMBER, FIFTEEN (15) WERE RULED JUSTIFIABLE HOMICIDES BY THE PROSECUTOR'S OFFICE, AND THESE ASSAILANTS WERE EXONERATED. TWELVE (12) OF THESE FIFTEEN (15) HOMICIDES WERE COMMITTED BY WHITE PUBLIC POLICEMEN, ONE (1) BY A WHITE PRIVATE POLICEMAN AND TWO (2) BY WHITE CITIZENS.
- d) DURING THIS SAME PERIOD -- 1958 THROUGH 1961 -- THE PROSECUTOR'S OFFICE EXONERATED ONLY ONE WHITE POLICEMAN ACCUSED OF KILLING A WHITE CITIZEN. THE TOTAL OF SUCH KILLINGS IS NOT SHOWN.

BREAKDOWN BY YEARS

IN 1958 THE PROSECUTOR'S OFFICE RULED THAT FOUR (4) HOMICIDES WERE JUSTIFIABLE. THE VICTIMS OF EACH OF THESE WERE NEGRO MALES. THE PERPETRATORS WERE ONE NEGRO CITIZEN, ONE WHITE CITIZEN, ONE WHITE PUBLIC POLICE OFFICER, AND ONE WHITE PRIVATE POLICE OFFICER. THERE WERE FIVE (5) NEGROES KILLED BY WHITES IN 1958. THREE (3) OF THESE WERE RULED JUSTIFIABLE HOMICIDE. THERE WERE EIGHT (8) WHITES KILLED BY NEGROES IN 1958. NONE OF THESE WAS RULED A JUSTIFIABLE HOMICIDE.

IN 1959 THE PROSECUTOR'S OFFICE RULED THAT EIGHT (8) HOMICIDES WERE JUSTIFIABLE. THE VICTIMS WERE SEVEN (7) MALE NEGROES AND ONE WHITE MALE. THE WHITE MALE WAS KILLED BY A WHITE PUBLIC POLICEMAN. THE NEGROES WERE KILLED BY TWO (2) NEGRO CITIZENS AND FIVE (5) WHITE PUBLIC POLICEMEN. EIGHT (8) NEGROES WERE KILLED BY WHITES IN 1959; FIVE (5) OF THESE KILLINGS WERE RULED JUSTIFIABLE HOMICIDES. SIX (6) WHITES WERE KILLED BY NEGROES IN 1959 AND NONE OF THESE KILLINGS WAS RULED A JUSTIFIABLE HOMICIDE.

IN 1960 THE PROSECUTOR RULED THAT SIX (6) HOMICIDES WERE JUSTIFIABLE. THE VICTIMS WERE FIVE (5) NEGRO MALES AND ONE WHITE MALE. THE WHITE MALE

WAS KILLED BY A WHITE MALE CITIZEN. ONE (1) OF THE MALE NEGROES WAS KILLED BY A NEGRO MALE CITIZEN. THE OTHER FOUR (4) NEGRO MALES WERE KILLED BY WHITE PUBLIC POLICEMEN. THERE WERE FOUR (4) NEGROES KILLED BY WHITES IN 1960. ALL OF THESE KILLINGS WERE RULED JUSTIFIABLE HOMICIDE. THERE WERE ELEVEN (11) WHITES KILLED BY NEGROES IN 1960. THE PROSECUTOR RULED THAT NONE OF THESE KILLINGS WERE JUSTIFIABLE.

IN 1961 THE PROSECUTOR'S OFFICE RULED THAT FOUR (4) HOMICIDES WERE JUSTIFIABLE. THE VICTIMS WERE ONE (1) WHITE MALE AND THREE (3) NEGRO MALES. THE WHITE MALE WAS KILLED BY A WHITE CITIZEN. ONE (1) NEGRO MALE WAS KILLED BY A WHITE CITIZEN. THE OTHER TWO (2) NEGROES WERE KILLED BY WHITE PUBLIC POLICEMEN. THERE WERE SIX (6) KILLINGS OF NEGROES BY WHITES IN 1961. THREE (3) OF THESE WERE RULED JUSTIFIABLE HOMICIDE. THERE WERE NINE (9) KILLINGS OF WHITES BY NEGROES IN 1961. NONE OF THESE WAS RULED A JUSTIFIABLE HOMICIDE.

#### SPECIFIC CASES

IN EACH OF THE FOLLOWING SPECIFIC CASES THE PROSECUTING ATTORNEY'S OFFICE FOUND THE HOMICIDE TO BE "JUSTIFIED," OR THE VIOLENCE TO BE EXCUSABLE. IT DECLINED TO RECOMMEND A WARRANT AND IT THEREBY PREVENTED A JUDICIAL INVESTIGATION BY THE COURTS INTO THE CIRCUMSTANCES SURROUNDING THE ALLEGED CRIME. IT IS COMMON KNOWLEDGE IN DETROIT THAT THE ISSUANCE OF A WARRANT IS PRACTICALLY IMPOSSIBLE WITHOUT THE PRIOR RECOMMENDATION OF THE PROSECUTOR.

OUR VERSION OF THE FACTS IN THESE CASES IS PRESENTED UPON INFORMATION AND BELIEF AND IS SUPPORTED BY NEWSPAPER CLIPPINGS FROM THE DETROIT PRESS WHICH WILL BE MADE AVAILABLE TO THE COMMISSION UPON REQUEST.

#### THE MAGNOLIA STREET INCIDENT:

WHAT HAS BECOME KNOWN AS THE "MAGNOLIA STREET INCIDENT" OCCURRED IN 1959 AND CONCERNED THE ARREST OF FOUR (4) NEGRO YOUTHS WHO WERE TAKEN TO THE VERNOR PRECINCT STATION WHERE ONE OF THEM WAS BRUTALLY BEATEN, KICKED AND SLUGGED, WHILE HANDCUFFED ON THE FLOOR OF THE GARAGE AT THE STATION. THIS INCIDENT WAS WITNESSED BY TWO (2) FREE PRESS PHOTOGRAPHERS. PROSECUTOR OLSEN FOUND NO CAUSE FOR ACTION AGAINST THE POLICE OFFICERS INVOLVED.

#### THE WILLIAM GREEN SHOOTING:

IN SEPTEMBER, 1961, A DETROIT PATROLMAN NAMED ABRAHAM AZZAM ARRESTED WILLIAM GREEN, A 32 YEAR OLD NEGRO WORKMAN, ON SUSPICION OF BREAKING AND ENTERING. THE "SUSPICION" WAS BASED UPON THE FACT THAT GREEN AND TWO (2)

OF HIS FELLOW WORKERS WERE SEATED IN A PARKED CAR NEAR GRAND RIVER AVENUE AT THE CLOSE OF A DAY OF HOUSEPAINTING AND CEMENT WORK. SOME OF THEIR TOOLS WERE ON THE FLOOR OF THE CAR AND OTHERS IN THE TRUNK OF THE CAR WERE EXAMINED BY THE OFFICER. WHEN GREEN PROTESTED THE ILLEGALITY OF HIS ARREST A FIGHT ENSUED BETWEEN HIM AND THE OFFICER. THE OFFICER WAS KNOCKED TO THE PAVEMENT AND GREEN ATTEMPTED TO RUN AWAY. WHEN HE FAILED TO STOP AT THE OFFICER'S COMMAND, THE OFFICER SHOT HIM IN THE SPNE, CAUSING HIM TO BE PARALYZED FROM THE WAIST DOWN. AS A RESULT OF HIS PARALYTIC CONDITION, GREEN HAS SUFFERED THE AMPUTATION OF ONE LEG, AND HAS BEEN A BED-RIDDEN INVALID EVER SINCE. NOTWITHSTANDING THE SWORN STATEMENTS OF SEVERAL EYE-WITNESSES TO THE ABOVE FACTS, THE PROSECUTOR'S OFFICE FOUND THE HOMICIDE JUSTIFIABLE AND REFUSED TO ISSUE A WARRANT FOR AZZAM'S ARREST AND EXAMINATION BEFORE A JUDGE. SHORTLY AFTER THIS AFFAIR, AZZAM LEFT THE DETROIT POLICE DEPARTMENT. A SUIT FOR CIVIL DAMAGES BROUGHT AGAINST AZZAM WAS SETTLED BY THE CITY OF DETROIT, PAYING APPROXIMATELY TWENTY-THREE THOUSAND (\$23,000.00) DOLLARS.

THE GRADY LITTLE INCIDENT:

IN 1962 A NEGRO, GRADY LITTLE, WAS FATALLY STABBED BY FRED O'DELL, A WHITE CITIZEN. PROSECUTOR OLSEN REFUSED TO ISSUE A WARRANT FOR O'DELL'S ARREST. THE INCIDENT WAS THEN INVESTIGATED BY THE MICHIGAN ATTORNEY GENERAL, WHO CONCLUDED THAT THE CIRCUMSTANCES WERE SUFFICIENT TO JUSTIFY A COURT INVESTIGATION AND THEREFORE ISSUED A FIRST DEGREE MURDER WARRANT. AT THE TRIAL OF THIS CASE O'DELL WAS ACQUITTED.

THE KIRBY BROWN INCIDENT:

SOMETIME DURING THE FIRST HALF OF 1963, KIRBY BROWN, PART NEGRO AND PART INDIAN, WAS IN HIS LIVING ROOM ON BAGLEY STREET WHEN HE WAS DELIBERATELY SHOT BY A WHITE POLICEMAN WHO RESENTED THE FACT THAT BROWN PREVIOUSLY HAD ORDERED THE POLICEMAN FROM THE BACK YARD OF THE BROWN HOME. THE FACTS INDICATED THAT THE POLICEMAN LEFT THE YARD, RETURNED TO HIS CAR, OBTAINED HIS REVOLVER AND THEN CAME BACK TO THE BROWN HOME AND SHOT BROWN WHEN HE OPENED THE DOOR. INITIALLY THE PROSECUTOR'S OFFICE RULED THIS SHOOTING TO BE JUSTIFIED BUT LATER, WHEN THE OTHER POLICE OFFICERS WHO WITNESSED THE AFFAIR REFUSED TO SUPPORT THE ASSAILANT'S VERSION OF WHAT HAPPENED, PROSECUTION WAS INSTITUTED AND RESULTED IN A CONVICTION OF A FELONIOUS ASSAULT. THE PENALTY, HOWEVER, WAS A MERE TWO (2) YEAR'S PROBATION. SUBSEQUENTLY, A CIVIL SUIT WAS BROUGHT BY BROWN AGAINST THE

POLICEMAN AND WAS SETTLED BY THE CITY OF DETROIT, PAYING APPROXIMATELY TWO THOUSAND FIVE HUNDRED (\$2,500.00) DOLLARS.

THE CYNTHIA SCOTT INCIDENT:

IN JULY, 1963, A NEGRO WOMAN, CYNTHIA SCOTT, AN ALLEGED PROSTITUTE, WAS ARRESTED FOR "INVESTIGATION." ONE OF THE WHITE ARRESTING OFFICERS CLAIMED THAT THE WOMAN ATTACKED HIM WITH A KNIFE WHILE PROTESTING HER ARREST. WHEN SHE FAILED TO STOP WITHIN A DISTANCE OF APPROXIMATELY FIVE FEET, HE SHOT HER. SHE WAS DEAD ON ARRIVAL AT THE HOSPITAL. THE PROSECUTOR'S OFFICE RULED THAT THE HOMICIDE WAS JUSTIFIED AND REFUSED TO ISSUE A WARRANT AGAINST THE OFFICER AND THUS PREVENTED A COURT INVESTIGATION.

THE REACTION OF THE NEGRO COMMUNITY TO THIS APPARENTLY WANTON KILLING WAS SUCH THAT THE ATTORNEY GENERAL OF MICHIGAN ORDERED THAT THE CASE BE RE-OPENED AND INVESTIGATED BY HIS OFFICE.

THE CLIFTON ALLEN INCIDENT:

IN EARLY JULY, 1964, SARGEANT LOUIS CLAUSI OF THE DETROIT POLICE ATTEMPTED TO ARREST A 17 YEAR OLD NEGRO BOY NAMED CLIFTON ALLEN WITHOUT A WARRANT. WHEN ALLEN ATTEMPTED TO RUN AWAY HE WAS SHOT THROUGH THE HEAD BY THE POLICEMAN. THE POLICEMAN HAS NEVER BEEN CRIMINALLY PROSECUTED FOR THIS OFFENSE.

THE NATHANIEL WILLIAMS INCIDENT:

SOMETIME IN DECEMBER, 1964, A FIFTEEN YEAR OLD NEGRO YOUTH, NATHANIEL WILLIAMS, WAS SHOT AND KILLED BY A DETROIT POLICEMAN WHEN HE SOUGHT TO AVOID ARREST BY RUNNING AWAY.

THE JOHN CHRISTIAN INCIDENT:

IN MARCH, 1965, A TWENTY YEAR OLD NEGRO YOUTH, JOHN CHRISTIAN, WAS SHOT AND KILLED AT THE AZZAM MARKET ON FOURTEENTH STREET BY JACOB AZZAM, THE BROTHER OF THE SAME ABRAHAM AZZAM MENTIONED ABOVE WHO WAS RESPONSIBLE FOR THE PARALYTIC CONDITION OF THE NEGRO, WILLIAM GREEN.

THE KILLING OF CHRISTIAN SEEMS TO HAVE RESULTED FROM HIS RESENTMENT AND PROTEST OVER THE LANGUAGE USED BY THE STORE CLERK IN REMONSTRATING A NEGRO CHILD WHO ALLEGEDLY HAD STOLEN A COOKIE. JACOB AZZAM, BECOMING INCENSED OVER THE NEGRO'S PROTEST, DREW HIS PISTOL AND KILLED CHRISTIAN JUST AS CHRISTIAN WAS LEAVING THE STORE. HIS DEFENSE WAS THAT CHRISTIAN HAD ATTACKED HIM WITH A KNIFE AND ALTHOUGH HE EXHIBITED A CUT FINGER, NO KNIFE WAS FOUND ON CHRISTIAN. PROSECUTOR OLSEN EXONERATED JACOB AZZAM ALMOST IMMEDIATELY AND RULED THAT THE KILLING WAS JUSTIFIED.

THIS LATEST MANIFESTATION OF ANTI-NEGRO BIAS BY THE PROSECUTOR'S OFFICE SO INFLAMED THE NEGRO COMMUNITY IN THE VICINITY OF THIS KILLING THAT THE AZZAM STORE WAS PICKETED DAILY FOR APPROXIMATELY TWO (2) MONTHS. THE WAYNE COUNTY PROSECUTOR, AT THE BEHEST OF THE AZZAM FAMILY, FURTHER INFLAMED RACE RELATIONS IN THE COMMUNITY BY OBTAINING "JOHN DOE" WARRANTS AND ARRESTING THE PICKETS AND THEIR SYMPATHIZERS INDISCRIMINATELY UPON A SPURIOUS CHARGE OF "CONSPIRACY" TO INJURE THE AZZAMS IN THEIR BUSINESS. THE QUESTIONABLE MOTIVE BEHIND THE "CONSPIRACY" CHARGE WAS REVEALED WHEN THE PROSECUTOR'S OFFICE VOLUNTARILY DISMISSED THE CASES IN RETURN FOR AN AGREEMENT BY THE PICKETS TO CEASE THEIR PICKETING.

CONDONATION OF POLICE ANTI-NEGRO VIOLENCE:

THE FOREGOING SPECIFIC CASES DO NOT PURPORT TO EXHAUST THE INSTANCES IN WHICH THE PROSECUTOR'S OFFICE HAS EXCUSED HOMICIDES COMMITTED BY WHITES UPON NEGROES DURING THE PAST FOUR (4) YEARS. AS WE POINTED OUT, IN THE BEGINNING, OFFICIAL RECORDS OF THE DETROIT POLICE ON THIS SUBJECT APPEAR TO HAVE STOPPED IN 1961. HOWEVER, A CURSORY EXAMINATION OF DETROIT NEWSPAPER FILES WILL INDICATE WITH WHAT CONSISTENCY THIS PATTERN OF RACIALLY DISCRIMINATORY ENFORCEMENT -- OR LACK OF ENFORCEMENT -- HAS BEEN FOLLOWED BY MR. OLSEN.

IN ADDITION TO THIS PATTERN OF ANTI-NEGRO CONDUCT IN THE PROSECUTION OF HOMICIDES INVOLVING NEGROES, THERE HAVE BEEN NUMEROUS INSTANCES OF POLICE VIOLENCE AGAINST NEGROES WHICH HAVE BEEN EXCUSED BY THE PROSECUTOR'S REFUSAL TO ISSUE A WARRANT:

- A) IN JUNE OF 1964, CLARENCE BAGLEY AND HIS WIFE WERE STOPPED FOR A TRAFFIC VIOLATION, TAKEN TO A PRECINCT STATION WHERE HE WAS BEATEN SO BADLY HE WAS IN THE HOSPITAL FOR FOUR (4) DAYS. THE MICHIGAN CIVIL RIGHTS COMMISSION FOUND THAT THE POLICE OFFICERS WERE IN THE WRONG, BUT THUS FAR NO CRIMINAL PROSECUTION HAS BEEN INSTITUTED AGAINST THOSE OFFICERS AND ALL THAT HAS RESULTED HAS BEEN A REPRIMAND.
- B) IN AUGUST, 1964, A WHITE MAN REPORTED HIS WALLET HAD BEEN STOLEN BY A NEGRO WOMAN, BARBARA JACKSON. SUBSEQUENT INVESTIGATION REVEALED THAT THE WALLET HAD NOT BEEN STOLEN. NEVERTHELESS, BARBARA JACKSON WAS ARRESTED, BEATEN OVER THE HEAD WITH A FLASHLIGHT, HER FACE SMASHED AND HORRIBLY DISFIGURED, WAS HANDCUFFED,

THROWN TO THE FLOOR, BEATEN AND KICKED IN THE SPINE, HELD INCOMMUN-  
ICADO FOR FOUR (4) HOURS AND THEN RELEASED WITHOUT ANY CHARGES  
BEING FILED AGAINST HER. THE MICHIGAN CIVIL RIGHTS COMMISSION  
FOUND THAT THE POLICEMEN WHO DID THE BEATING WERE IN THE WRONG BUT  
THUS FAR THERE HAS BEEN NO CRIMINAL PROSECUTION AGAINST THE POLICE  
OFFICERS.

c) IN DECEMBER, 1964, EDWARD DOWDELL, TWENTY YEARS OF AGE, WAS  
ARRESTED FOR AN ALLEGED TRAFFIC OFFENSE. WHILE UNDER ARREST HE  
WAS BEATEN SO SEVERELY THAT HE SUSTAINED A PARTIAL PARALYSIS OF THE  
WRIST AND HAD TO HAVE NEURO-SURGERY PERFORMED. IT DOES NOT APPEAR  
THAT ANY ACTION HAS BEEN TAKEN AGAINST THE RESPONSIBLE POLICE  
OFFICERS.

d) ALSO, IN DECEMBER, 1964, EDGAR TAYLOR, A NEGRO PHOTOGRAPHER SUS-  
TAINED A BROKEN JAW WHEN HE WAS ATTACKED BY PATROLMAN MICHALSKI  
WHO WAS OFF DUTY AT THE TIME AND RESENTED TAYLOR'S ATTEMPT TO  
MAKE PHOTOGRAPHS OF CERTAIN POLICE CONDUCT. SUBSEQUENTLY, THE  
POLICEMAN WAS TRIED BY THE POLICE TRIAL BOARD AND SUSPENDED FROM  
DUTY FOR ONE (1) YEAR.

RESPECTFULLY SUBMITTED,

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GEO. W. CROCKETT, JR., AGENT AND  
ATTORNEY FOR COMPLAINANTS WHOSE NAMES  
ARE ATTACHED HERETO AND MADE A PART  
HEREOF.  
3220 CADILLAC TOWER  
DETROIT 26, MICHIGAN  
WOODWARD 5-0050

STATE OF MICHIGAN )  
                          ) SS  
COUNTY OF WAYNE  )

ON THIS \_\_\_\_\_ DAY OF MAY, 1965, BEFORE ME PERSONALLY

APPEARED THE ABOVE NAMED GEO. W. CROCKETT, JR., WHO, BEING DULY SWORN SAYS HE HAS READ THE FOREGOING APPLICATION BY HIM SIGNED AND KNOWS THE CONTENTS THEREOF AND THAT THE SAME IS TRUE OF HIS OWN KNOWLEDGE, EXCEPT AS TO THE MATTERS THEREIN STATED TO BE UPON INFORMATION AND BELIEF, AND AS TO THOSE, BELIEVES IT TO BE TRUE.

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COMPLAINANTS

NORTHERN STUDENT MOVEMENT

By: \_\_\_\_\_  
FRANK JOYCE

Address: \_\_\_\_\_

ADULT COMMUNITY MOVEMENT FOR EQUALITY

By: \_\_\_\_\_  
WILBERT McCLENDON

Address: \_\_\_\_\_

UNITY FOR MANKIND

By: \_\_\_\_\_  
GOMER McNEIL

Address: \_\_\_\_\_

CONGRESS OF RACIAL EQUALITY

By: \_\_\_\_\_  
DONALD ROBERTS

Address: \_\_\_\_\_

THE NAMES OF THE INDIVIDUAL COMPLAINANTS NUMBERING APPROXIMATELY SIX HUNDRED (600), APPEAR ON THE PETITIONS ATTACHED HERETO AND MADE A PART HEREOF. IN ADDITION, WE ARE PREPARED TO FILE UPON THE REQUEST OF THE COMMISSION, SUBSCRIBING PETITIONS BY APPROXIMATELY TWO THOUSAND (2,000) ADDITIONAL COMPLAINANTS.