

The Only Magazine of Its Kind

For the first time in the history of the world, a magazine has been published which is devoted to the study of the human mind and its activities. It is the only magazine of its kind in the world, and it is the only one that is published by a government department. It is the only one that is published by a government department, and it is the only one that is published by a government department. It is the only one that is published by a government department, and it is the only one that is published by a government department.

THE SERIES

Published by the Department of Psychology, University of California, Los Angeles, California, U.S.A.

THE VOLUME

Volume 1, Number 1, 1954

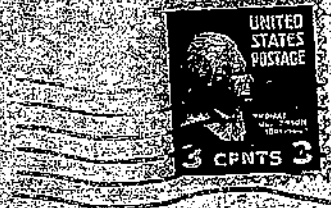
20 West 4th Street, NEW YORK 14, N.Y.

Published by the Department of Psychology, University of California, Los Angeles, California, U.S.A.

[Lined area with heavy noise and grain, likely containing a message or address that is illegible due to the quality of the scan.]

*Post 281
Chicago Ill*

OFFICE
MAR 12
1946
3 PM
ILL.



*Mr. Harry J. Moore
Room 4
Minn's Ill*

Chisley Ida

Feb 26 - 1946

Dear Mr Moore

Yours of the 25th
was received. Contents noted
carefully. Very sorry to know that
the same trouble is in your
country. Mr Moore I hope to see
you in Jacksonville on March
2nd and 3rd. And we can
discuss this matter now. In this
mean time if you are not planning
to be there keep me informed on
actions of Atty. Watson. Oh yes
Mr Thomas is in Ft. Lauderdale
Fla. 227 W. 1st Ave. I am also writing
him to night. We are representing in
the State Conference this week end.
I feel that you will not have a stone
unturned on this registering issue.
I tell the fellows here that I wish
you could be here in each of our
meetings and wish they were
all like Harry J. Moore. I advise
you and your work.

Sincerely

William James Sea Moore
Washington County, Oregon

Chilsey Fla

Mar. 12 1946

Dear Mr. Brown

Received your letter
Contents noted & fully. These
Copies you are keeping are posted
with case very helpful. Now since
the books had gone Court House
Registration is proceeding nicely.
Although there are some nasty phras-
es coming from some of the future
Candidates with no regards I am
asking each voter to remember
these phrases on the day of

the first primary that will
Candidates entering and I will
be watching for some event.
Sorry to know that your and your
group is still having that trouble
Probably the Dult will get someone
convinced. Oh yes what was that
protest. We used ask to write letters to
Winter Haven Fla protesting Garfield
Sherris. I got that down but cant
think just what happen. Hoping you

Miss. Success. I must relate
this to you one whoogie or Creecher
said to the Registrar says Leonard
are you registering these damn
Niggers. Leonard the Registrar says.

yes. Then the Cracker ask what
Authority did he have to do so.
He told him he had to do so are
James Smith. Then the Cracker
Say Register them and put the
Same Names D. He is one of the
expected future Candidates. But
I am asking every citizen to get
his Registering Receipt. So if there
is any other trick for us to wait
for that you know of tell me

Sincerely
Wilson Dorman Dec 11 1920
Phon 281

House of Representatives
Washington, D. C.
March 27, 1946

Mr. Harry T. Moore, President
Florida State Conference, NAACP
Miami, Florida

Dear Sir :

I am in receipt of your letter of March 19th and the enclosure. Let me say to begin with that I deeply abhor lynchings and will never take part in one, regardless of the circumstances. The courts should handle these matters and of course would if it were not for some notheads. On the other hand, when the Anti-Lynch Bill came on the floor of the House we attempted to put a provision in it including gang killings in the larger cities throughout the nation, which are no less lynchings than any lynching you mention in Florida. This of course was voted down by the big cities and the big states.

In my opinion the Anti-Lynch Bill is not only unconstitutional from the standpoint of infringement of States' Rights but is also a very dangerous piece of legislation. The bills that I have voted against previously provided that when a lynching occurred the peace officers of that particular county would be subject to a fine and imprisonment, and in addition the people of the county would be taxed for \$10,000 to go to the family of the person who was lynched. You can readily see that people would not pay such a tax and it may lead to the death of other citizens. A jury in Florida would return a conviction under such circumstances.

No stretch of the imagination can lynching be considered a Federal offense unless those participating cross the State line and it has not been pointed out to me where this has been true in any instance. I deplore any lynching in Florida and I hope we will never have another. I wish that you would consider the record of the South for the last thirty years and not the last three years. You will note that lynching has decreased by many hundreds per cent.

I was raised by negroes. I have lived and associated with them all my life. I challenge anyone to find a negro with whom I have been associated who will condemn me of any treatment that I have ever done to them.

I cannot vote for such an Anti-Lynch Bill as is now before the House of Representatives. This position has always been clear. The negro of the State of Florida will vote in the primaries for the first time this election. His advancement is strictly within his own hands. If he votes independently and thinks before he votes he will advance himself. If he is herded by Communists or their kin to them into voting in groups for measures which are opposed to the best interests of this nation, then he will regress.

Respectfully,

Joe Hendricks

Copy

Comment : On March 19th we mailed letters to the Florida delegation in Congress, in which we urged the to support anti-lynching legislation. Congressman Hendricks is the only one who sent a reply.

Mims, Florida
September 21, 1946

Hon. H. J. Moss
Candidate for Congress
132 S. Main Street
Orlando, Florida

Dear Sir :

Prior to the May primaries we mailed copies of the inclosed letter to candidates seeking the Democratic nomination to various offices.

We note that you will oppose the Hon. Joe Hendricks for his seat in Congress from the Fifth District in the coming General Election. We therefore are asking for an expression of your views on the important issues mentioned in the inclosed letter.

We shall be grateful for an early reply, as the Progressive Voters' League of the Fifth District will hold a meeting in Sanford Saturday, Sept. 28, at 10:00 A. M.

Sincerely yours,

Harry T. Moore
Executive Secretary

Mims, Florida
October 1, 1946

Hon. H. J. Moss
Candidate for Congress
132 S. Main Street
Orlando, Florida

Dear Sir :

On Sept. 21 we mailed you correspondence, in which we asked for an expression of your views on CIO, anti-lynching legislation, and other issues that are very vital to the welfare of our group. We had hoped to get an answer from you in time to present it to our district meeting in Sanford on Sept. 28, but perhaps the time was too short for you to get your reply to us by that date.

We are now about ready to send out certain recommendations to our voters in the Fifth District. However, it will be impossible for us to make intelligent recommendations with reference to candidates for Congress until we get your reply to our communication of Sept. 21.

Sincerely yours,

Harry T. Moore
Executive Secretary

Comment : Up to this date (Oct. 21) we have not received a reply to either of these letters

Mims, Florida
October 12, 1946

Hon. J. Harry Schud
Candidate for U. S. Senate
Gainesville, Florida

Dear Sir :

We have read with much interest the detailed outline of your platform on foreign and domestic issues, which was published in the Florida Times Union on Oct. 8. We note, however, that your platform makes no mention of your stand on such vital issues as FEPC, the poll tax, and anti-lynching legislation. We note also that you express clearly your opposition to communism, but you fail to state your attitude with reference to the Ku Klux Klan and other "hate" organizations that are designed primarily to prey upon minority groups.

The issues mentioned above are of primary importance to our group. We feel that a strong permanent FEPC is needed to safeguard Negroes and other minority groups from discrimination in employment. Although Florida voters already have been relieved of the poll tax, we feel that the anti-poll tax bill should be passed for the benefit of voters in other states. We can never have a wholesome democracy so long as the exercise of franchise is limited by such artificial restrictions as the poll tax, white primaries, etc.

The need of a strong federal law against lynching and mob violence is more evident now than ever before. State authorities either cannot or will not take effective action against lynchers. Among the recent examples right here in our own state are the lynching of Cellos Harrison at Marianna, the lynchings of Willie James Howard and Sam McFadden in Suwannee County, and the lynching of Jesse James Payne in Madison County. And just this year Leroy Bradwell, a Negro veteran of Midway, mysteriously disappeared while in the custody of the Gadsden County Sheriff. Only in the lynching of Sam McFadden has anyone been arrested or convicted. Even in this case the Suwannee County Grand Jury refused to return an indictment, and federal authorities could move only under a weak civil rights statute. Thus a man gets off with only a year in jail and a fine of 1000 for committing first degree murder. So long as these conditions exist in America, our democracy is little more than "sounding brass or a tinkling cymbal", and our delegates to the Peace Conference can easily be branded as hypocrites.

We shall appreciate an expression of your views on these issues.

Respectfully yours,

Walter W. Ware, Executive Secretary
Progressive Voters League of Florida

STAPLES

Congress of the United States
House of Representatives

OFFICIAL BUSINESS - FREE



FIVE
RED CROSS
WAR FUND
M.C.

Mr. Harry T. Moore, President
Florida State Conference, NAACP
Mims, Florida

JOE HENDRICKS
5TH DIST. FLORIDA

HOME ADDRESS
DELAND, FLORIDA

COMMITTEE
APPROPRIATIONS

CHAIRMAN
INDEPENDENT OFFICES
SUBCOMMITTEE

MEMBER
WAR SUBCOMMITTEE

Congress of the United States

House of Representatives

Washington, D. C.

March 27th

19 46

Mr. Harry T. Moore, President
Florida State Conference, NAACP
Mims, Florida

Dear Sir:

I am in receipt of your letter of March 19th and the enclosure. Let me say to begin with that I deeply abhor lynchings and will never take part in one, regardless of the circumstances. The courts should handle these matters and of course would if it were not for some hotheads. On the other hand, when the Anti-Lynch Bill came on the floor of the House we attempted to put a provision in it including gang killings in the larger cities throughout the nation, which are no less lynchings than any lynching you mention in Florida. This of course was voted down by the big cities and the big states.

In my opinion the Anti-Lynching Bill is not only unconstitutional from the standpoint of infringement of States' Rights but is also a very dangerous piece of legislation. The bills that I have voted against previously provided that when a lynching occurred the peace officers of that particular county would be subject to a fine and imprisonment, and in addition the people of the county would be taxed for \$10,000 to go to the family of the person who was lynched. You can readily see that people would not pay such a tax and it may lead to the death of other citizens. No jury in Florida would return a conviction under such circumstances.

By no stretch of the imagination can lynching be considered a Federal offense unless those participating cross the State line and it has not been pointed out to me where this has been true in any instance. I deplore any lynching in Florida and I hope we will never have another one. I also wish that you would consider the record of the South for the last thirty years and not only the last three years. You will note that lynching has decreased by many hundreds per cent.

I was almost raised by negroes. I have lived and associated with them all my life. I challenge anyone to find a negro with whom I have been associated who will condemn me of any treatment that I have ever accorded them.

I cannot vote for such an Anti-Lynching Bill as is now before the House of Representatives. This position has always been clear. The negro of the State of Florida will vote in the primaries for the first time this election. His advancement is strictly within his own hands. If he votes

(over)

independently and thinks before he votes he will advance himself.
If he is herded by Communists or those kin to them into voting
in groups for measures which are opposed to the best interests
of this nation, then he will retrogress.

Respectfully,

Joe Hendricks

JH:g

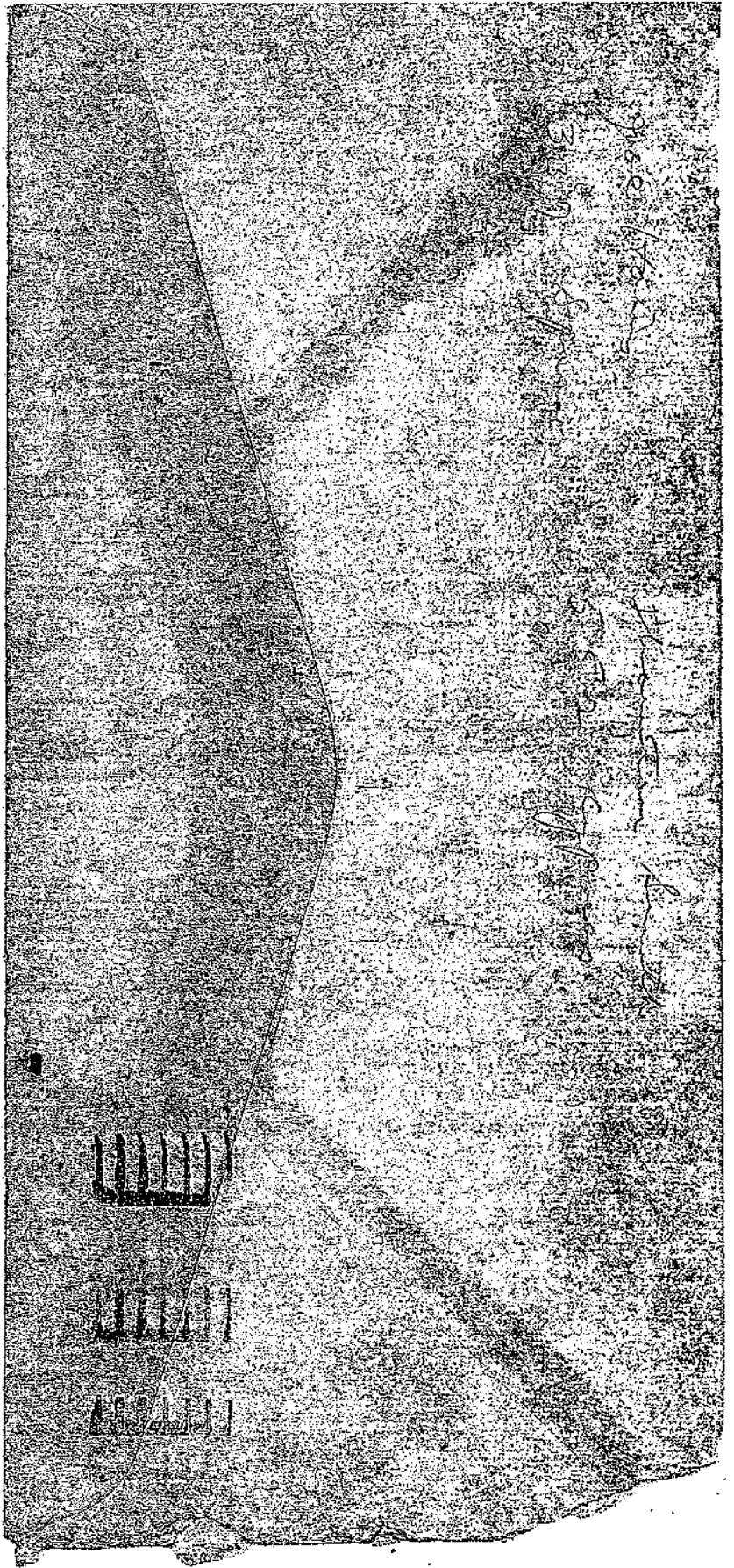
Hendricks

Albany
Franklin
W. A. Gilling
R. Harris
d. S. Jones

Mr. Henry M. Moore
Box 11
Miami, Florida



STAPLES



tained to meet any national emergency. This force must include well organized reserves and a thoroughly trained and equipped National Guard.

I do not believe in the continuation of the Draft as a solution to our problem of national defense. I do believe that an adequate force for national defense can be procured and maintained through volunteers . . . provided those volunteers are given just and adequate inducement in the form of pay and allowances comparable to civilian earnings. I shall sponsor legislation designed to achieve this result.

Social Security . . . Include Many Others

I believe our present social security laws should be broadened to include many persons not now covered.

State and District . . . for the People of Florida

I favor immediate release of surplus government supplies, lumber, and materials for home construction.

I believe in strong state governments with the states handling state affairs and the Federal government handling national affairs. We must reaffirm the principle of state rights in government.

I pledge my every effort toward the equalization of freight rates which are now unfair and discriminatory to Southern shippers.

I advocate increased Federal assistance in the development of our natural resources and waterways.

I shall work for a program to conserve our fish, game and wild life.

I am for bringing the people closer to their government and government closer to the people. To this end I plan to meet every year in each of the counties of the Fifth Congressional District to discuss public questions with the people so that I may better represent them in Congress.

SUMMARY

I believe in the need for a spiritual regeneration of our Nation. A moral letdown is inevitable. They follow all wars. Child welfare, juvenile delinquency, and the stressing of Christian teachings should receive the careful attention, not only of community leaders, but our state and national leaders as well.

In these critical times this Nation demands aggressive leadership in Congress and when elected your representative in Congress I pledge you my best efforts towards achieving the objectives submitted above.

★

Voss for Congress Campaign Headquarters:

117 South Court Street

ORLANDO, FLORIDA

Phone 2-0779

On "V-X" Day, May 7th,

Mark Your Ballot for

United States House of Representatives

Tom Voss "X"

FOR CONGRESS



TOM VOSS

Candidate For

**UNITED STATES HOUSE
OF REPRESENTATIVES**

*Fifth Congressional
District*

"A Vote for Tom Voss is a Vote for
Aggressive Leadership in Congress"

★

*Subject to Democratic Primary
May 7th*



TOM VOSS

Born and reared on a farm in North Carolina, one of a family of 12 children . . . 52 years of age . . . married and the father of two daughters.

Educated in the public schools of North Carolina . . . attended the University of North Carolina . . . studied law at the University of Pittsburgh—awarded an honorary bachelor's degree in education by the University of Pittsburgh.

Member of the Christian Church.

Fraternal Organization Membership: Masons, Shrine, Elks, American Legion, 40 and 8, Veterans of Foreign Wars, AMVETS.

Civic Club Membership: Kiwanis, Junior Chamber of Commerce.

Up From the Ranks

Entered military service in 1911 at the age of 17 . . . served as enlisted man for six years, serving in all grades from private to and including first sergeant.

Commissioned 2nd lieutenant of cavalry in regular army June, 1917, after competitive examination.

Served in all ranks from second lieutenant to and including full colonel . . . retired with rank of colonel in spring, 1946.

Service to His Country

Served with General Pershing's American Expeditionary Force in Mexico, 1916 . . . received letter of commendation for action under fire in that campaign.

Transferred to Army Air Corps, January, 1918 . . . served as flying instructor during World War I.

A Missionary of Good Will

Served as the representative of the commanding general of the Panama Canal Department in the boundary dispute between the Republics of Panama and Costa Rica . . . successfully negotiated settlement of dispute between these two countries . . . for this service was awarded letter of commendation from commanding general and letter of thanks from the State Department.

Leadership in World War II

Served at various stations throughout the United States as executive and deputy commander . . . later as commanding officer of the Orlando Air Base and MacDill Field base area of Tampa.

Assigned overseas September, 1943 . . . served with 9th Air Force as commanding officer of First Advanced Depot Area Command which comprised 199 separate organizations and included 27,000 enlisted men and 3,600 officers.

A Soldier of Distinction

Wears the following decorations and campaign medals: Legion of Merit with Cluster . . . Bronze Star with Cluster . . . French Croix de Guerre with Palm . . . Belgium Croix de Guerre with Palm . . . Commendation Medal with 10 Clusters . . . World War I and II campaign ribbons . . . Mexican campaign ribbon . . . Mexican Border campaign ribbon . . . Atlantic Theatre ribbon . . . European Theatre ribbon with six major battle engagement stars.

During military career of 35 years, commanded approximately one million enlisted men and officers . . . handled hundreds of millions of dollars worth of government property and finances. Not once during entire military service has a rating been received from senior officers below excellent.

TOM VOSS OFFERS THE PEOPLE HIS PLATFORM

World Affairs . . . He Will Help Win the Peace

Our Nation must have a sound foreign policy based upon mutual faith and cooperation with all countries. In this atomic age the United States must be strong both at home and abroad.

We have won two world wars but we have never won world peace. I am determined to assist in winning and maintaining such a peace to save the sacrifice of our boys and girls in this, and coming generations of Americans.

National Affairs . . . What He Will Fight For

We must bring about a drastic reduction in Federal spending, eliminating as quickly as possible many of the war-time emergency boards and agencies which imposed restrictions upon the American people.

I am opposed to Congress delegating its authority to boards and agencies that make rules and regulations which have the force and effect of law. This is the duty and responsibility of Congress alone.

Assistance to Aged and Needy . . .

Protect Self-Respect

Every right thinking American citizen is in favor of old age security and I shall both support and fight for the welfare of our elderly people.

Our aged and needy persons should not have to face poverty in this great country of ours. Their needs should receive early consideration by Congress followed by prompt and vigorous action.

Provision should be made to protect the self-respect of our elderly citizens and not force them to declare themselves paupers to qualify for these benefits.

Veterans . . . He Will Fight for Them

Having served as an enlisted man for six years, and, with a total of 35 years in the regular Army, I have a keen, personal interest in, and a thorough knowledge of Veterans' problems. I will not only support vigorously legislation regarding Veterans but will fight for the welfare of all Veterans and their families.

I will fight also for immediate clarification in the administration of the G.I. Bill of Rights, along with other Veterans legislation, and seek the elimination of all red tape. I am definitely in favor of more and better-equipped hospitals for wounded and disabled Veterans, and I will fight with all my strength for this program.

I shall insist upon and fight for the payment of accrued leave due enlisted men and women upon their separation from the service. I advocate also the amending of the Social Security Law to give credit to military personnel during their period of service.

Labor and Capital . . . "Live and Let Live"

I advocate an economic policy for capital and labor based upon the principle of "live and let live." Both capital and labor must recognize a mutual dependence of each upon the other plus an obligation and duty to the public.

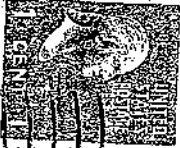
National Defense . . . Security For Our People

We must have a program of national defense which will give security to the Nation at all times. A strong regular Army, Navy, and Air Force should be main-

LAW OFFICE
E. H. McLEATH, ATTY.
222 Graham Bldg.
JACKSONVILLE, FLA.

Mr. Harry T. Moore
Box 4
Mims, Florida

JACKSONVILLE
APR 15
6 PM
1948



IN THE UNITED STATES DISTRICT
COURT, IN AND FOR THE SOUTHERN
DISTRICT OF FLORIDA, ORLANDO
DIVISION.

CASE NO.

J. W. Burns,

Plaintiff

-vs-

J. P. WILSON, City Clerk of
the City of Titusville, Florida;
W. J. DARDEN, Mayor of the City
of Titusville, Florida; and
N. W. BRYAN, W. J. BAILEY, G. F.
DUREN, HERBERT THOMPSON, and
G. B. HIGGS, members of the City
Council of the said City of
Titusville, Florida.

Defendants

TO: THE HONORABLE JUDGES OF SAID COURT:

Comes the plaintiff, J. W. Burns, suing on behalf of himself and all other qualified negro voters similarly situated in said City of Titusville, Florida, and brings this his Bill of Complaint against J. P. Wilson, City Clerk of the City of Titusville, Florida; W. J. Darden, Mayor of the City of Titusville, Florida; and N. W. Bryan, W. J. Bailey, G. F. Duren, Herbert Thompson, and G. B. Higgs, members of the City Council of the said City of Titusville, Florida, and who have unlawfully denied the plaintiff and other qualified negro voters in said City of Titusville, Florida, the right to vote in and to register as qualified voters in the city elections of said City of Titusville, Florida, for the reasons hereinafter set forth, all of which reasons are predicated substantially upon the race or color of the plaintiff and such other qualified negro voters, as follows, to-wit:

1. The jurisdiction of this court is invoked under subdivision 1 of Section 41 of Title 28 of the United States Code, this being an action at

law which arises under the Constitution and laws of the United States, viz., Sections 2 and 4 of Article I, and Amendments Fourteen, Fifteen and Seventeen of said Constitution and Sections 31 and 43 of Title 8 of the United States Code, wherein the matter in controversy exceeds, exclusive of interest and costs, the sum of \$2,000.00. The jurisdiction of this Court is also invoked under subdivision 11 of Section 41 of Title 28 of the United States Code, this being an action to enforce the right of a citizen of the United States to vote in the City Election of said City of Titusville, Florida. The jurisdiction of this court is further invoked under subdivision 14 of Section 41 of Title 28 of the United States Code, this being an action at law authorized by law to be brought to redress the deprivation under color of law, statute, regulation, custom and usage of a State of rights, privileges and immunities secured by the Constitution of the United States, viz., Sections 2 and 4 of Article I, and Amendments Fourteen, Fifteen and Seventeen to said Constitution, and of rights secured by laws of the United States, viz., Sections 31 and 43 of Title 8 of the United States Code, all of which will appear more fully hereafter.

2. Plaintiff further shows that this is a proceeding for declaratory judgment and is injunction under Section 400 of Title 28 of the United States Code (Section 2740 of the Judicial Code) for the purpose of determining a question in actual controversy between the parties, to-wit, the question whether the practice of the defendants in enforcing and maintaining the policy, custom and usage by which plaintiff and other negro citizens similarly situated are qualified electors and denied the right to cast ballot at the Democratic primary elections in said city solely on account of their race or color, violates Sections 2 and 4 of Article I and Amendments Fourteen, Fifteen and Seventeen to the Constitution of the United States.

3. That all parties to this action, both plaintiff and defendants, are citizens of the United States and of the State of Florida, and are resident and domiciled in said City.

4. That the plaintiff, J. W. Burns, is a negro. He is a citizen of the United States, is more than twenty-one years of age, has resided in said city continuously for more than six months prior to the year 1945 and during the entire year 1945. Plaintiff at all times mentioned herein was and is a duly and legally qualified elector under the Constitution and laws of the United States and of the State of Florida and of said City of Titusville, Florida, and is subject to none of the disqualifications for voting under said Constitution and laws. Plaintiff is a believer in the tenets of the Democratic Party. He was at all times complained herein, and is now, ready and willing to take the pledge required by the laws of the State of Florida and of said City of Titusville, Florida, of all persons voting in the Democratic Primary elections in said city and in the general elections in said city, as well.

5. That this is a class action authorized by Rule 23-a of the Rules of Civil Procedure of the District Courts of the United States. The rights involved are of common and general interest to the members of the class represented by the plaintiff, namely, negro residents of said City of Titusville, Florida, similarly situated who are duly qualified to be electors in the elections in said City of Titusville, Florida, both primary and general. The members of the class are so numerous as to make it impracticable to bring them all before the court and for this reason plaintiff prosecutes this action in his own behalf and on behalf of the class, without specifically naming said members herein.

6. That under and by virtue of the Charter and Ordinances of said City, and in accordance with proclamation dated September 20, 1945, and duly published according to law and issued by the Mayor of said City, a primary election was called for and to be held on the twenty-fourth day of September, 1945 at the City Hall in said City for the purpose of nominating candidates for the general election later to be held in said City.

7. That on the fourth day of September, 1945, while the registration books of said City were open for registration, the plaintiff herein did properly present himself at the office of the city clerk of said city and offered himself as a qualified elector in and for said city and to be registered as such; but the defendant herein, J. P. Wilson, acting by and through his deputies and clerks then in charge of said office did refuse and decline to register or permit the registration of the plaintiff herein as a qualified elector in said city; said refusal and declination being upon the sole ground that the plaintiff was a negro; and that the City Council in said city had given to said J. P. Wilson, his clerks and deputies no authority to register the plaintiff or any other negro.

8. That the plaintiff desired to participate in said municipal election of September 24, 1945 and was entitled so to do save and excepting his lacking registration as a qualified elector and that by reason of the refusal and declination of said defendant acting as aforesaid, this plaintiff was prevented from participating in said election and the plaintiff was thereby deprived of his right privilege under the Constitution of the United States, including the Fourteenth, Fifteenth and Seventeenth Amendments to said Constitution, and the laws of the United States enacted in pursuance of said Amendments, to-wit: Plaintiff's right and privilege to be registered as a qualified elector in and

for said city and his right and privilege to participate in said election of September 24, 1948.

9. That the defendants herein and all of them have conspired, conspired and deliberately for the past many years placed all manner of obstacles in the way of the plaintiff and other negroes in the City of Titusville similarly situated from participating or becoming qualified to participate in the elections in said City of Titusville, both primary and general, and that the refusal set forth in paragraph 7 hereof was a part and parcel of a continuous course of action on the part of the defendants herein to prevent the plaintiff and other negroes in said City of Titusville from so qualifying for said elections. That from time to time and with respect to other negroes in said city similarly situated to the plaintiff; the defendants, acting as aforesaid, have refused and declined to register or permit the registration of, or to permit the plaintiff and other negroes similarly situated from participating in said municipal elections upon the following specific grounds and others of similar kind and character too numerous to mention, as follows, to-wit:

A. That the plaintiff and others were negroes.

B. That the Democratic Party of said City of Titusville is a voluntary association of individuals and electors which prescribes and determines its own membership for the purpose of selecting its choice of candidates to be placed upon the ballot in the general elections of said City and associated together solely for the purpose of nominating candidates for the several municipal offices of Titusville and not otherwise.

C. That the defendant, J. E. Wilson, in registering electors is governed by the rules and regulations of the several political parties as members of which the several electors choose to register and that the rules and regulations

promulgated by the duly elected Democratic Executive Committee for said City of Titusville, promulgated and adopted for the purpose of determining who shall be entitled to participate in the Democratic Primaries, specially provide that the members of the Democratic Party of said City of Titusville shall consist of only white electors and that the plaintiff could not qualify under said rules and regulations in that he is a member of the negro race.

D. That the so-called municipal election held September 24, 1945 was an election for white electors only and that the plaintiff herein was not qualified to participate therein because the plaintiff was a negro.

E. That said defendant, J. P. Wilson, was too busy.

F. That the deputies and clerks in said office of J. P. Wilson were not authorized to register negroes.

G. That there was a local custom, practice and/or law and/or ordinance of said City of Titusville which prohibited the registering of negroes.

H. That the plaintiff and other negroes similarly situated in said City of Titusville, Florida, had prior to September 24, 1945 and while the registration books were open for registration, repeatedly and consistently attempted to register and offered themselves for registration and offered to take the prescribed oath required of qualified electors but have been consistently and repeatedly refused and prevented from qualifying as such electors either as members of the Republican Party or as members of the Democratic Party, in accordance with their choice, upon one or another of the grounds herein set forth, but all of which said grounds were predicated upon that the plaintiff and such others were negroes.

I. That unless the court decrees the rights of the parties hereto the said defendants will continue to refuse to register, or prevent the registering of the plaintiff and such others, and that thereby the plaintiff and such others will be deprived of their rights under the Constitution of the United States and of the laws of the State of Florida and of said City of Titusville, to-wit: to register

and participate in the city elections of said city.

WHEREFORE plaintiff prays judgment against the defendant as follows:

1. That the plaintiff have judgment against the defendants for \$50,000.00 damages.
2. That the defendants and each of them, individually and in their official capacity as well, be enjoined from refusing to register or causing to be registered the plaintiff herein and other negroes similarly situated in said City of Titusville upon the grounds that the plaintiff and such others are negroes.
3. That this court adjudge and decree the rights and legal relations of the parties to the subject matter herein in controversy in order that such declaration shall have the force and effect of a final judgment or decree.
4. That this court enter a judgment or decree declaring that the policy, custom and usage or ordinance or laws prevailing in said City of Titusville in denying negroes the right to vote in the Democratic Primary elections in and for said city as well as in the general elections in said city, solely on account of the plaintiff's and such others race or color, is unconstitutional and in a violation of Sections 3 and 4 of Article I and Amendments 14, 15, and 17 of the United States Constitution.
5. That the court will allow the plaintiff his costs herein and such further additional or alternative relief as may appear to the court to be just and equitable in the premises.

R. K. McIlrath, Attorney for
the Plaintiff, 121 Graham
Building, Jacksonville, Florida