[fol. 920] ANSWER TO INTERROGATORY NUMBER 15(a) AS TO THE FACTUAL BASIS FOR THE ASSERTION THAT THE PURPOSE OF SECTION 241-A OF THE MISSISSIPPI CONSTITUTION WAS TO SUBJECT THE VAST MAJORITY OF NEGRO CITIZENS OF VOTING AGE IN MISSISSIPPI TO THIS ADDITIONAL REQUIREMENT WHEN THEY ATTEMPT TO BECOME REGISTERED VOTERS; AND TO EXEMPT THE MAJORITY OF THE WHITE CITIZENS OF VOTING AGE IN MISSISSIPPI FROM THIS REQUIREMENT SINCE THEY ARE ALREADY REGISTERED VOTERS, AND TO PROVIDE AN ADDITIONAL DEVICE WITH WHICH REGISTRARS COULD DISCRIMINATE AGAINST NEGRO CITIZENS WHO SEEK TO REGISTER TO VOTE—A MEANS OF DISCRIMINATION WHICH WOULD MAKE DETECTION MORE DIFFICULT.

The factual basis for the assertion that the purpose of Section 241-A of the Mississippi Constitution was to subject the vast majority of Negro citizens of voting age in Mississippi to this additional requirement when they attempt to become registered voters; and to exempt the majority of the white citizens of voting age in Mississippi from this requirement since they are already registered voters; and to provide an additional device with which registrars could discriminate against Negro citizens who seek to register to vote—a means of discrimination which could make detection more difficult is as follows:

The nature and sequence of legislative events affecting Negroes in Mississippi was as follows:

November 1959 —A Mississippi Advisory Committee for the United States Civil Rights Commission was established.

[fol. 921] January—The Congress of the United States considered and debated the proposed Civil Rights Act of 1960 providing, among other things, for the authority of the Attorney General to inspect and copy voter registration records upon his demand and for the appointment of federal referees in cases involving voter discrimination.