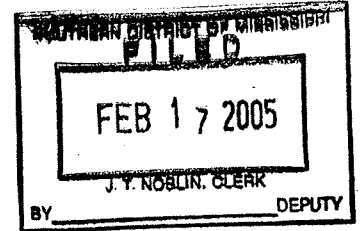


IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
Eastern Division



UNITED STATES OF AMERICA)

Plaintiff,)

v.)

CIVIL ACTION NO. 4:05CV 33TSL-AGA

IKE BROWN, individually, and)
in his official capacities as)
Chairman of Noxubee County)
Democratic Executive)
Committee and Superintendent)
of Democratic Primary)
Elections; NOXUBEE COUNTY)
DEMOCRATIC EXECUTIVE)
COMMITTEE; CARL MICKENS,)
individually, and in his)
official capacities as the)
Circuit Clerk of Noxubee)
County, Superintendent)
of Elections,)
Administrator of absentee)
ballots and Registrar of)
voters; the NOXUBEE COUNTY)
ELECTION COMMISSION;)
NOXUBEE COUNTY, MISSISSIPPI;)
and those acting in concert,)

Defendants.)
_____)

CONSENT DECREE

The United States filed the complaint in this case on February , 2005. The complaint alleges that certain of the Defendants have violated Section 2 of the Voting Rights Act, as amended, 42 U.S.C. Section 1973a, by employing voting-related practices and procedures which have the purpose and/or the result of denying white voters and white candidates and the voters who support them an equal opportunity to cast their votes and have them counted for their preferred candidates. Further, it is alleged that, in violation of Section 2 of the Voting Rights Act, the actions of certain of the Defendants have had the purpose and/or result of denying these groups of voters and candidates their right to participate in elections that are untainted by the counting of illegal votes that are accepted on the basis of race of the voter. In addition, the complaint alleges that certain of the Defendants have violated Section 11(b) by subjecting voters to intimidation, threats, and coercion related to the voters' candidate preference.

Defendants Carl Mickens and Noxubee County, Mississippi have not admitted the allegations of the complaint and, in fact, have specifically denied the allegations.

To avoid protracted and costly litigation, these parties have agreed that this lawsuit should be resolved through the terms of this Consent Decree (hereinafter the "Decree").

Accordingly, the United States and Defendants Carl Mickens and Noxubee County, Mississippi hereby consent to the entry of this Decree, as indicated by the signatures of counsel and parties at the end of this document. These parties waive a hearing and entry of findings of fact and conclusions of law on all issues involved in this matter.

These Defendants are committed to comply fully with all provisions of the Voting Rights Act of 1965, as amended, in future elections and stipulate that each provision of this Decree is appropriate and necessary.

Accordingly, it is hereby ORDERED, ADJUDGED AND DECREED that:

1. Defendants and others acting in concert with them are permanently enjoined from imposing or applying any qualification or prerequisite to voting or any standard, practice, or procedure which has the purpose or the result of denying or abridging the right of any citizen of the United States to vote on account of race or color.

2. Defendants and others acting in concert with them are permanently enjoined from undertaking any action which intimidates, threatens, or coerces, or attempts to intimidate, threaten, or coerce any person voting or attempting to vote, or any person urging or aiding any person voting or attempting