

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

UNITED STATES OF AMERICA

CRIMINAL NO. 3:07cr9 HTW JCS

v.

JAMES FORD SEALE

18 U.S.C. § 1201(a)
18 U.S.C. § 1201(c)

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. The White Knights of the Ku Klux Klan (WKKKK) operated in the Southern District of Mississippi and elsewhere, and was a secret organization of adult white males who, among other things, targeted for violence African-Americans they believed were involved in civil rights activity in order to intimidate and retaliate against such individuals.

2. Defendant JAMES FORD SEALE (SEALE) was a member of the WKKKK, which organized and held regular meetings as a group or "klavern" in Franklin County, Mississippi during the 1960s.

3. HENRY HEZEKIAH DEE (HENRY DEE) was a young African-American man who the WKKKK suspected of being involved in civil rights activity.

4. CHARLES EDDIE MOORE (MOORE) was a young African-American man who was a friend of DEE.

COUNT ONE

[18 U.S.C. § 1201(c) Kidnaping; Conspiracy]

1. From on or about May of 1964, through in or about 1966, in Franklin County; in the Jackson Division of the Southern District of Mississippi and elsewhere,

the defendant JAMES FORD SEALE, along with other WKKKK members known and unknown to the Grand Jury, conspired to unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away, HENRY DEE and CHARLES MOORE, and transport DEE and MOORE in interstate commerce for the purposes of interrogation and assault. DEE and MOORE were not liberated unharmed, and the kidnappings and abductions resulted in the deaths of DEE and MOORE.

Overt Acts

In furtherance of this conspiracy, and to accomplish its objectives, the conspirators committed the following overt acts, among others, in and around the Southern District of Mississippi and elsewhere:

1. On or before May 2, 1964, in Franklin County, Mississippi, defendant SEALE and other WKKKK members known and unknown to the grand jury agreed to abduct and question HENRY DEE, who they believed might have knowledge about African-Americans importing firearms to Franklin County.
2. On or about May 2, 1964, defendant SEALE and other WKKKK members known to the Grand Jury drove to Meadville, Mississippi, to abduct HENRY DEE.
3. On or about May 2, 1964, defendant SEALE abducted DEE and MOORE in Meadville, Mississippi.
4. On or about May 2, 1964, defendant SEALE, followed by other WKKKK members known to the grand jury, transported DEE and MOORE to the Homochitto National Forest in Mississippi.

5. On or about May 2, 1964, defendant SEALE aimed a sawed-off shotgun at DEE and MOORE while fellow members of the WKKKK known to the grand jury beat DEE and MOORE with switches and tree branches.

6. On or about May 2, 1964, defendant SEALE and other WKKKK members known to the grand jury questioned DEE and MOORE while beating them, and thereby coerced DEE and MOORE to admit, falsely, that they had information about firearms being smuggled into Franklin County.

7. On or about May 2, 1964, after extracting false information from DEE and MOORE, WKKKK members known to the grand jury traveled to a church in Roxie, Mississippi, where they unsuccessfully searched for firearms with the local sheriff.

8. While WKKKK members known to the grand jury traveled to Roxie, defendant SEALE and another co-conspirator known to the grand jury transported DEE and MOORE to the Franklin County, Mississippi, farm of another co-conspirator known to the grand jury.

9. While at the co-conspirator's farm, defendant SEALE and other WKKKK members known to the Grand Jury bound DEE and MOORE with duct tape.

10. On or about May 2, 1964, after the search of the church in Roxie, defendant SEALE and other WKKKK members known and unknown to the grand jury transported DEE and MOORE, who were still alive, from the co-conspirator's farm in Franklin County, Mississippi, across state lines and through part of Louisiana, to Parker's Landing on the Old Mississippi River in Warren County, Mississippi.

11. On or about May 2, 1964, defendant SEALE and other WKKKK members known to the grand jury attached a Jeep engine block to DEE, took him out onto the water in a boat, and threw him in the Old Mississippi River, killing him.

12. On or about May 2, 1964, defendant SEALE and other WKKKK members known and unknown to the grand jury attached iron weights and railroad rails, among other things, to MOORE, took him out onto the water in a boat, and threw him in the Old Mississippi River, killing him.

13. On or shortly after May 2, 1964, defendant SEALE and other WKKKK members known and unknown to the grand jury met to discuss the murders of DEE and MOORE and the need to maintain secrecy among the co-conspirators.

All in violation of Section 1201(c) Title 18, United States Code.

COUNT TWO

[18 U.S.C. § 1201 (a) Kidnaping]

On or about May 2, 1964, in Franklin County, in the Jackson Division of the Southern District of Mississippi and elsewhere, the defendant, JAMES FORD SEALE, aided and abetted by other members of the WKKKK known and unknown to the Grand Jury, did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away HENRY DEE, and did knowingly transport DEE in interstate commerce for the purposes of interrogation and assault. DEE was not liberated unharmed, and the kidnaping and abduction resulted in DEE's death.


All in violation of Section 1201(a), Title 18, United States Code.

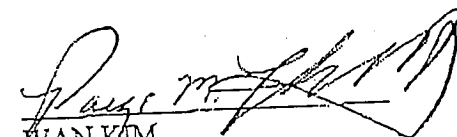
COUNT THREE

[18 U.S.C. § 1201 (a) Kidnaping]

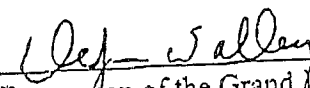
On or about May 2, 1964, in Franklin County, in the Jackson Division of the Southern District of Mississippi and elsewhere, the defendant, **JAMES FORD SEALE**, aided and abetted by other members of the WKKKK known and unknown to the Grand Jury, did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away **CHARLES MOORE**, and did knowingly transport **MOORE** in interstate commerce for the purpose of interrogation and assault. **MOORE** was not liberated unharmed, and the kidnaping and abduction resulted in **MOORE'S** death.

All in violation of Section 1201(a), Title 18, United States Code.

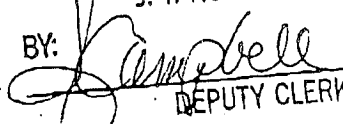

DUNN LAMPTON
United States Attorney

for 
WAN KIM
Assistant Attorney General

A TRUE BILL:


Foreperson of the Grand Jury

A TRUE COPY, I HEREBY CERTIFY.
J. T. NOBLIN, CLERK

BY: 
DEPUTY CLERK