

STATE OF LOUISIANA }  
PARISH OF ORLEANS } ss.:

SUSAN B. PATTERSON, being duly sworn, deposes and says:

I reside at 134 West 15th Street, New York, New York.

I am a native born citizen of the United States of America and am 26 years old.

I am a member of the "freedom school" teaching program that is being operated in Mississippi by the Council of Federated Organizations (COFO). I am a graduate student at Hunter College in New York City, and I have been teaching history and the United States/Constitution to Negro children at the "freedom school" in Hattiesburg, Mississippi, at the Truelight Baptist Church there.

Peter Werner is also a teacher at that school. He teaches science, math and music to Negro children. On July 20, 1964, two teachers from that school, the aforesaid Peter Werner and William D. Jones, and I went shopping in downtown Hattiesburg. At about 2:00 P.M. William D. Jones entered the Standard-Walgreen drug store on Main Street. Peter Werner and I remained standing outside the store although we were about to enter. Peter Werner walked to the street curb to signal a car which he thought contained some of his friends. I watched him as he was doing that. At that point I saw a man strike Peter Werner about the head and neck with his fists. I subsequently learned that this man's name is Houston Hartfield. He is a white man. Peter Werner fell to the pavement and curled up, clasping his hands behind his head, with his knees drawn up and his ankles crossed. Houston Hartfield kicked him about his head and back. Peter Werner at no time attempted to fight back, nor did he say anything to Houston Hartfield while he was being beaten. I screamed, "Help, Police!" many times. A policeman then came and stopped Hartfield from beating Peter Werner. That policeman took Hartfield to the police station, and Jones, Werner and I followed. In the station, Peter was told he was under arrest for assault and battery, and he was then booked on that charge. He was released on \$25. cash bond for a hearing that afternoon.

Sworn to before me this  
27th day of July, 1964

Lolis E. Elie

Susan B. Patterson  
SUSAN B. PATTERSON

LOLIS E. ELIE  
Notary Public, Parish of Orleans, State of La.  
My Commission is issued for life.