

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MARYLAND
GREENBELT DIVISION**

MS. PATRICIA FLETCHER,)
et al.,)
)
)
 Plaintiffs,)
)
)
 v.)
)
 LINDA LAMONE in her official)
 capacity as State Administrator of)
 Elections for the state of Maryland;)
 And ROBERT L. WALKER in his)
 official capacity as Chairman of the)
 State Board of Elections,)
)
 Defendants.)
)
 _____)

Civ. Action No.: RWT-11-3220

DECLARATION OF ELLA WHITE CAMPBELL

I, Ella White Campbell, declare based on personal knowledge and experience and pursuant to 28 U.S.C. § 1746:

1. I am an African-American resident of Baltimore County, Maryland. I have lived in Maryland for about 65 years and for 35 years in Baltimore County. I have a Doctorate degree from the Family Bible Institute of America, a Masters degree in History from Morgan State and a Bachelors degree from Morgan State in Music Education.
2. I am currently retired but I spent 26 years in the Baltimore City Schools working as a teacher, a department head, an Assistant Principal, and as Supervisor of Curriculum Instruction.
3. As a child growing up in Maryland I attended segregated schools in Anne Arundel County. The schools for African Americans did not have the resources of the white schools. I don't believe I was exposed to academic and other experiences in my segregated school that would

stimulate intellectual development as much as children who attended white schools. We did not have sufficient books and a very limited library. When we took literature we didn't have books to take home so we had to leave them in the classroom because there weren't enough to go around.

4. As a child I vividly remember passing a sign in Glen Burnie, Maryland on my way to school each day that said "Nigger – don't let the sun go down." I knew there were areas that I should not be in at night for fear of my own safety as an African American.
5. As an African American I couldn't shop in all the stores I wanted. I couldn't eat in any restaurants. Once on a school trip with my team to the eastern shore we stopped for gas and were denied service because we were African American.
6. As an adult about ten years ago I was working on an issue of a strip club in the community and attended a meeting in the Baltimore County Executive's office. During the meeting and in front of a County Councilman and two members of the community, the Baltimore County Zoning Commissioner called me a "black bitch" to my face.
7. Due to having the lowest test scores of the county in our area, as part of the Liberty Road Community Council I participated in onsite visitation of schools in Baltimore County. We found that the schools in the Northwest section of the county, which is predominately African American, and the schools in the Southwest section of the county, which is predominately minority including African Americans, ranked the lowest on almost every category we reviewed.
8. We discovered that in 2001-02, Baltimore County had 2,385 non-tenured teachers. In the Northwest area there 543 or 32.9% of all teachers in the area. In the Southwest there were

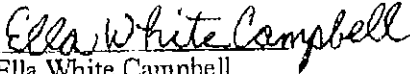
644 or 39.4% of all teachers in the area. There was a direct relationship between the high number of non-tenured teachers and the high minority population of the school.

9. We found there were an overwhelming number of principals in the Northwest and Southwest areas who had less than three years' experience.
10. Truancy was a tremendous problem in the Northwest and Southwest areas. These areas had the highest suspension rates in the county.
11. We found that in the Northwest and Southwest areas nothing was being done to address poor performance on MSAP scores. There were few positive reports related to expected learning outcome. There was very little parent involvement and no collaboration with the community.
12. Graduation rates in the Northwest and Southwest areas were very poor and there were only a limited amount of special programs for low performance in reading and math.
13. These conditions were true even though one of highest income areas in county is in the Northwest area. The lowest income areas in the county are in the Southwest. Despite the economic difference the academic performance and conditions were the same in the two areas.
14. Qualified teachers make a tremendous difference in school regardless of where it is located. When there are definitive goals for students and they are communicated to students and parents you get high performance. Suspension and truancy have tremendous impact on education success. It makes a tremendous difference if schools establish special programs to address reading, math, science and technology.
15. Most schools in the Northwest and Southwest areas had insufficient libraries, including books over 35 years old. They had few computers and most textbooks were outdated.
16. I testified at the Governor's Redistricting Advisory Commission hearing held at the

Randallstown Community Center. I testified about my feeling that the redistricting process should be bipartisan and that the lines should not be drawn based on party to assist or hurt one incumbent congressman or another. I stated the Commission should take into account communities of interest and that every effort should be made to avoid diluting African American voting strength. I was discouraged by my experience before the Commission because I felt that it was an exercise in futility. I could tell from their nonverbal cues and body language that they had their mind made up as to how they would do it and would not consider my views or the views of the African American community.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on December 6, 2011.


Ella White Campbell