

**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 ROBINA SPRUILL

I, Robina Spruill, declare based on personal knowledge and experience and pursuant to 28 U.S.C. § 1746:

1. I am an African-American resident of Waldorf in Charles County, Maryland. I have lived in Maryland since about 1993. I have degree in Secretarial Science from Catherine Gibbs Business School in New York. I am currently attending Strayer University to obtain a Bachelor's Degree in Business Administration with a concentration in acquisitions.
2. I am employed by Chick-Fil-A in Brandywine, Maryland. Prior to being laid off in 2008 I was the office manager for the lobbying firm Capitol Counsel in D.C. Prior to that I worked for ten years for another lobbying firm, Smith Reed Group, as the office manager.
3. I witnessed my children treated differently because they were African American by white teachers and school staff. My son, who admittedly struggled in school, was told by a white

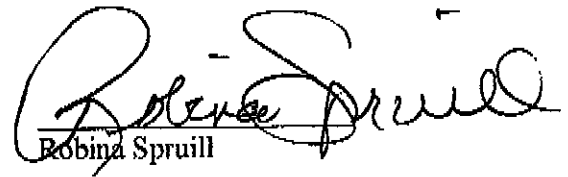
teacher that he should just get his GED instead of trying to graduate. They would not have given up on my son if he were not African American. I personally witnessed my daughter being treated differently than white students by a white counselor. I witnessed white students interacting in a cooperative way with the counselor but when it was my daughters turn the white counselor turned combative. I confronted the counselor and told her she had treated my daughter differently because of her race.

4. My grandson currently attends school in Charles County. He was in a predominately African American elementary school where I was appalled at the lack of academic rigorousness. They simply were not teaching the children. I learned that the school flunked academic standards for two straight years and I moved my grandson to a different school outside my neighborhood.
5. I have been told there are areas of Charles County where African Americans are not supposed to go at night. I was traveling in the Najemoy area intending to meet friends when I got lost. I called my friends for directions and was instructed to stay where I was and they would come get me. They said that as an African American they did not want me, for my own personal safety, to get further lost and enter nearby areas where African Americans were not welcome at night.
6. There are numerous areas in Charles County where majority African Americans live that are so poor they do not have running water or electricity to their homes. I have worked to try to get more funding and services to these areas.
7. I testified before the Governor's Redistricting Advisory Committee at a hearing held at the College of Southern Maryland in La Plata. I testified that because Charles County was now

majority African American we deserved the chance to be represented in a majority-minority congressional district. I heard other white people testify about how they didn't want change and did not want people coming down from Prince George's County. I understood this to be racially motivated and that they didn't want to be represented by an African American.

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

Executed on December 6, 2011.


Robina Spruill