

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

MS. PATRICIA FLETCHER,)	
<i>et al.</i> ,)	
)	
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 REGINALD JONES

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

1. I am an African-American resident of Potomac in Montgomery County, Maryland. I am 42 years old and am a small business owner. I own a retail business in Prince George's County as well as have an IT consulting business. I have a bachelor's degree in Information Systems Management from the University of Maryland and also attended the Air Force Academy. I have lived in Maryland since 1993.
2. I feel that racial discrimination is institutionalized in the government in Maryland and I routinely feel as if I am treated differently or more harshly because of my race.
3. I have been pulled over by white police officers on more occasions than I can count because I was African-American. I often travel from my store in Prince George's County to

my home in Potomac. I previously owned and regularly drove a BMW 750. The harassment grew so routine that I decided to sell my luxury automobile and I now drive a Honda Civic.

4. On one occasion I was driving home from closing my store late at night and was followed by a police officer. After stopping at a light, I was pulled over. The white police officer told me he had pulled me over because my front tire was in the crosswalk. He questioned me about the ownership of my car, why I was driving in Prince George's County at night, and generally about my business. After questioning he let me go without any discussion of citation or wrongdoing.
5. On another occasion I was driving home from closing the store and was again pulled over. I was told he pulled me over because he was checking my registration. The car was new and still had the dealer tags at the time. The police officer noticed my money pouch from the store in my front seat and I told him I had cash and register receipts in the pouch from my business. Although I explained that I owned a retail business and the money and cash register receipts were from the business the officer became suspicious and ordered my passenger and I to get out of the car where we were further questioned. During the course of the questioning I informed the officer that I was legally transporting a firearm from my business to my home. I was arrested and my car was impounded. After retaining a lawyer the charges were eventually dropped.
6. My business is in an African-American and Latin American neighborhood and I have felt harassed by white police officers. Two white police officers began coming into my store routinely questioning me. They initially did not believe I owned the store because I was African-American. They questioned me about my activities and my business – a movie rental store. They asked me why I did not have a sales license. I replied that I only rent and



therefore no sales license was needed. Despite this, they issued me multiple citations for failure to have a sales license which totaled to more than \$500 in fines and required appearance in court.

7. Through my own neglect I missed the assigned court appearance related to the sales license issue. Despite only missing one court appearance, on a business license charge, an arrest warrant was issued that day. I was later pulled over by four police officers, in the parking lot across from my business. I was shackled at the hands and feet and forced to sit in jail. After waiting for several hours I was let go and a new court date was issued.
8. I appeared at the new court date and was encouraged by the Court to plea down the charges and pay the fines. I represented myself and told the Court I wanted a trial. After trial the charges were dropped.
9. The police officers who had been harassing my store were in the Court for the trial and I could tell they were upset at the result. That same afternoon they showed up at my store attempting to find some other pretense for harassment. I told my store manager to close the store in the middle of the business day so that we could avoid further harassment.
10. Harassment continued and I eventually gave up and applied and now have a sales license even though it is not required as found by the Court.
11. The actions by the police were racially motivated and I was forced to suffer personal humiliation, loss of business and profits, and increased regulatory cost as a result of the racial discrimination.
12. In general my experiences in court have led me to feel that because of my race I am presumed to be not telling the truth. I have been treated disrespectfully and spoken down to




like I was a child because of my race. I have also witnessed other African Americans treated this way in court as I waited for my turn.

13. Prior to moving to Potomac, Maryland I lived in Germantown, Maryland. In Potomac, I am the only African-American within several blocks. I lived in a predominately African American community in Germantown. My move was motivated by an attempt to escape the effects of racial discrimination evident in my former neighborhood. This includes lack of resources and economic outlets for me and my children. Even though I am African American in a white neighborhood I am treated with more respect in general because I live in Potomac versus when I lived in an African American neighborhood in Germantown.

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

Executed on December 6, 2011.


Reginald Jones