

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

MS. PATRICIA FLETCHER, et al.)	
)	
Plaintiffs,)	Civ. Action No.: RWT-11-3220
)	
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.)	
)	

AFFIDAVIT

COMES NOW the Affiant, Gloria G. Lawlah, and makes oath and affirms under the penalties of perjury that the following is true and correct based upon his personal knowledge:

1. I am over the age of eighteen and competent to testify.
2. I am the Secretary of Aging for the State of Maryland. I have served in this capacity as either the acting and permanent secretary from February 7, 2007 to the present.
3. From 1987 to 2007, I served in the Maryland General Assembly. From 1987 to 1991, I served in the Maryland House of Delegates. From 1991 until my appointment as Secretary of Aging in 2007, I served in the Maryland Senate. During those 16 years, Thomas V. Mike Miller, Jr. was president of the Maryland Senate.
4. I grew up in Newberry, South Carolina. I attended Hampton University, where I received my B.S. degree, and Trinity College where I received a Master's Degree. I was a teacher and

administrator in the District of Columbia Public School System for thirty years. I served as external relations officer for Bowie State University for thirteen years.

5. Since coming to Prince George's County, I have been a leader in efforts to advance the leadership of women and African-Americans in the county and throughout the State of Maryland. I am or have been a member of the National Hook-up of Black Women; National Council of Negro Women (life member); National Association for the Advancement of Colored People (NAACP); Alpha Kappa Alpha; Coalition on Black Affairs, National Political Congress of Black Women, 1984-90; Prince George's County Alliance of Black Elected Officials; National Association of Minority Political Women; Past Chair, Board of Directors, Women in Government, 2006. I am also currently President of the Women Legislators Foundation.

6. I have reviewed the affidavit of Patricia Fletcher and in particular her allegations in paragraph 11 about Senator Miller's introduction of me at a dinner meeting with the Prince George's County Senate Delegation and the Prince George's Senators. Ms. Fletcher's allegation is false. Senator Miller has never made such an introduction of me, either at a meeting that Ms. Fletcher was present or at any other time.

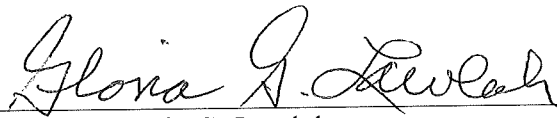
7. I have known Senator Miller for at least 24 years when I was first elected to the legislature. We have a deep mutual respect. He has introduced me many times in public. The introductions have always been flattering, supportive and appropriate. He has never made the kind of introduction of me described by Ms. Fletcher

8. I was shocked to read Ms. Fletcher's allegation in paragraph 10 of her affidavit in which she alleges that Senator Miller and other officials used the word "n*****" in the 1988 Dukakis campaign to describe citizens of Prince George's County. In the nearly quarter of a century that

I have known Senator Miller, I have never heard him use the word "n*****" ever in any situation.

9. I have great difficulty believing Ms. Fletcher's allegation that Senator Miller or any other public officials ever used the word "n*****" in strategy meetings during the 1988 Presidential campaign. While Prince George's public officials frequently disagree with each other on matters of strategy and policy, every public official I know would find the use of this word in any setting appalling and completely unacceptable. Not only has this word never been used in any meetings I have ever attended, it is unthinkable that any other officials present would remain silent about its usage, either at the time, or for the next 23 years.

10. Pursuant to 28 U.S.C. § 1746 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct based upon my personal knowledge. Executed this ___ day of December, 2011.

A handwritten signature in cursive script, reading "Gloria G. Lawlah", written over a horizontal line.

Gloria G. Lawlah