

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

MARYLAND OFFICE OF THE PUBLIC  
DEFENDER, *et al.*

PLAINTIFFS,

v.

TALBOT COUNTY, MARYLAND,

DEFENDANT.

**Civil Action No.: No. 1:21-cv-01088-ELH  
Judge Ellen L. Hollander**

**DECLARATION OF WALTER WELDON BLACK, JR.**

I, Walter Weldon Black, Jr., upon my personal knowledge, hereby submit this Declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am a longtime member and officer of the Talbot County Branch of the National Association for the Advancement of Colored People (NAACP). I currently serve on the Talbot County NAACP Executive Committee and the Branch's Legal Redress Committee, which I have previously chaired. Over the years, beginning in the 1960s, I have served as the President of the Talbot County NAACP, the President of the Maryland State Conference of NAACP Branches, and have been on the paid staff of the National NAACP in Baltimore. I am 85 years old, and considered an elder in Talbot County's Black community. I was born in Salisbury, but raised in Talbot County, have lived there for most of my life, and reside in Talbot County today.

2. The Talbot County NAACP is a non-profit membership-based organization, open to all county residents who are in accord with the principles and policies of the NAACP. Members pay annual dues to the organization, which are shared with the National NAACP and used to support the work of the Branch. The Talbot County NAACP currently has approximately 150 members, including myself and Richard Potter, who has served as the Branch President since 2015.

3. The mission of the NAACP is to “secure the political, educational, social, and economic equality of rights in order to eliminate race-based discrimination and ensure the health and well-being of all persons.” The vision of the NAACP is “to ensure a society in which all individuals have equal rights without discrimination based on race.” Our objectives are:

- a. To ensure the political, educational, social, and economic equality of all citizens;
- b. To achieve equality of rights and eliminate race prejudice among the citizens of the United States;
- c. To remove all barriers of racial discrimination through democratic processes;
- d. To seek enactment and enforcement of federal, state, and local laws securing civil rights;
- e. To inform the public of the adverse effects of racial discrimination and to seek its elimination;
- f. To educate persons as to their constitutional rights and to take all lawful action to secure the exercise thereof, and to take any other lawful action in furtherance of these objectives, consistent with the NAACP's Articles of Incorporation and this Constitution.<sup>1</sup>

4. Beginning in 2001, the Talbot NAACP Branch and other community members undertook a decade-long struggle to erect a monument of the abolitionist and civil rights activist Frederick Douglass on the Talbot County Courthouse lawn. There was enormous opposition to siting of the Douglass statue at the courthouse, much of which

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<sup>1</sup> <https://www.naacptalbot.org/mission-vision-objectives>

centered around the existing Confederate monument already there. During this period, Council members opposed to the Douglass statue called new public attention to the presence of the Talbot Boys monument, describing its courthouse location as “sacred ground” devoted to honoring those who fought for the Confederacy—notwithstanding the fact that this meant fighting for white supremacy and against the United States. Eventually, following years of debate, the Frederick Douglass monument was erected at the courthouse, but only with the proviso that it must be *smaller in size* than the Talbot Boys statue. For the NAACP, this requirement made plain the Council’s continued conviction and intended message that traitors to the United States who fought for the subjugation of Black people would forever remain superior to even the greatest Black hero, Talbot County native son Frederick Douglass, who dedicated his life to the abolition of slavery and equality under the law for all people.

5. Due to the Council’s reaffirmation of the racist message of the Talbot Boys statue through its public statements and the rules it imposed upon the Frederick Douglass statue, in the years that followed the Talbot County NAACP increasingly began focusing our resources and attention on removal of the Talbot Boys Confederate monument from the courthouse. Indeed, during much of the time between 2015 and the present, removal of the Confederate monument has been the primary initiative of the Branch, leading us to devote very substantial time, resources, and volunteers to the effort of having the Confederate monument removed.

6. It is the position of the Talbot County NAACP and its members that while the Talbot Boys monument is an insult to many people, both white and Black, that it is particularly hurtful to Black people, as it is discriminatory in that it celebrates those who

fought for the enslavement of Black people. The Talbot County NAACP takes the position that the presence of the Talbot Boys monument is outrageous and reprehensible, as discrimination stifles people's ambitions while it closes the doors of opportunity. When Black people are made to feel as a second-class citizen by white society, they believe they are unable to achieve, as white society will not accept them. This symbol of white supremacy at the courthouse—maintained by County edict as the highest monument at the courthouse—combines with the fact the staff at the Talbot County courthouse is almost completely white, to send a clear message to those looking for fair opportunities at the courthouse, whether be in employment, public services, or for justice through the court system, that they are unlikely to find fairness or equality of treatment there.

7. As with other NAACP members I know, the presence of the Talbot Boys monument at the courthouse affects me deeply personally, as well as in my capacity as a leader in the Talbot County NAACP. For me as a Black man, the existence of the Talbot Boys Confederate monument at the Talbot County courthouse is the ultimate insult. As memorializing the Confederacy glorifies white supremacy and Black oppression, the presence of this symbol at a public institution tasked with ensuring law and justice is a constant reminder of the history of Black people in this country being treated as chattel by our own government. Whenever I need to visit the Talbot County Courthouse, because I often must walk past the monument to enter the court, I do my best to not look at the Talbot Boys monument to avoid feeling angered and personally hurt by its presence.

8. The Talbot County NAACP is aware of community opposition to the presence of a Confederate monument at the Talbot County Courthouse, opposition that is particularly strong in the Black community. Disapproval from residents is grounded in

the view that the monument is an unjust and discriminatory symbol, which raises concern that Black persons may not get justice at the Talbot County Courthouse when they often must walk by a monument which glorifies white supremacy when entering the court. As an organization whose members are majority Black, and as an organization whose mission is to dismantle racial discrimination, the NAACP is bound to act on behalf of those marginalized voices in seeing to it that the Talbot Boys monument is removed from the courthouse.

9. In June of 2015, shortly after the massacre of nine Black churchgoers by a white supremacist at Mother Emanuel African Methodist Episcopal Church in Charleston, South Carolina, the Talbot NAACP made its first request to have the Talbot Boys monument removed from the courthouse lawn. Public hearings were held on the issue of removing the monument. Over the year that this campaign ensued, the removal initiative was the sole focus of the work of our Branch, encompassing all the time and resources of our volunteers, and diverting us from any other substantial work. Despite our extensive advocacy and organizational efforts to convince the County that it would be in the best interest of the community to have this monument removed, the County rejected the Talbot County NAACP's position, voting unanimously to keep the statue in place in June of 2016. In ensuing years, from 2017 through 2019, we repeatedly returned to this effort, but were not able to engage the County in further discussion. Then, finally in 2020, following the murder of George Floyd by a white police officer and the enormous community outcry about the government racism that permitted such killings to continue to occur, Talbot Council President Corey Pack, the sole Black member of the Talbot County Council, changed his mind about the monument, and introduced a resolution for its removal. The

Talbot NAACP Branch once again undertook an all-hands-on-deck effort to support the new resolution and remove the monument. Once again, all of our time and resources were diverted to the effort to move the monument, a process that continued through the August 2020 Council rejection of Council President Pack's resolution, and which still continues today, through our ongoing public advocacy and our participation as a named plaintiff in this lawsuit.

10. Despite numerous requests, statements at public hearings, rallies, and protests spearheaded by the Talbot County NAACP and other grassroots organizations, the County has refused to remove Talbot Boys monument from the Talbot County Courthouse. The County has had countless opportunities to remedy the wrong of having the monument erected on the courthouse lawn, but has maintained steadily that it intends to continue to allow a symbol of white supremacy and hatred to remain at the courthouse for all to see.

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



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Walter Weldon Black, Jr.  
Executive Board Member  
Talbot County NAACP

Dated: August 13, 2021