

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

Caroline County Branch of the
National Association for the
Advancement of Colored People, *et al.*,

Plaintiffs,

v.

Town of Federalsburg, Maryland,

Defendant.

Civil Action No. 23-00484-SAG

DECLARATION OF ELAINE HUBBARD

1. I, Elaine Hubbard, am over 18 years of age and am competent to testify. I submit this declaration upon personal knowledge in support of Plaintiffs' motion for preliminary injunction in this matter.

2. I have lived in Federalsburg for my entire life. I married, had a son, daughter, stepchildren, and now have grandchildren.

3. I worked at the Bank of America in the town for 35 years. I started as a part time bank teller, and worked my way up to becoming the branch manager.

4. Growing up, and continuing throughout my career, I always felt like the "token" Black person. I would almost always be the only Black person in a meeting or class.

5. My school was integrated in the fifth grade. As Black students, we got bad looks, and were called names by our white peers. The movie theater in town was segregated, the Black kids had to sit upstairs, while the white kids sat downstairs. The swimming pool in town was also exclusively for the white kids.

6. I was lucky that the racism many other Black community members have described was not something I often experienced. However, there have been some instances of discrimination. For example, one time in the mid-1970s, a customer came in to the bank where I was a teller and told me that he did not want to touch the money if I had touched it.

7. While I was working at the Bank, I wanted to become more involved in my community, so I worked for the election board for the local town elections. That is the only reason I ever knew when elections were, and made sure that my husband and I both always voted. Otherwise, we would have no way of knowing when or where to vote. Town elections are not publicized well, and it is hard to know when it is election day, or who is running. That is how it has always been in Federalsburg; growing up, I do not recall ever hearing anyone discuss voting in municipal elections

8. It is extremely important to me to have Black representation in the Town Council. For about 40 years, Shirley Greene served as the town clerk, a position in the town office. She spent her last couple of years in office as the town manager. We felt like she was the only way any member of the Black community had a channel to our town government, and was the only way the Black community was being represented, and that our voices were being heard. Sadly, once the new mayor was elected, it is my opinion that she made her feel so uncomfortable that she decided to leave her position. I believe that this caused her to retire earlier than I think she otherwise would have. If we had real representation on the Town Council, we would not have to rely on indirect channels to get help from our Town government.

9. It would mean a lot to me to see someone that looks like me as an elected official. That would make me feel secure, unlike how I feel with our current Town officials and Police Chief. I want everyone in the town to feel as though they are on the same level playing field. That's

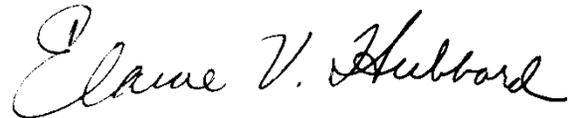
not possible without representation. We merely want to be equal, and have a pleasant place to live. I want Federalsburg to be a place where you can raise your family and your grandchildren, and to feel that our children are safe and that they know they can be whatever they want to be. Without Black representation in office, I do not feel that is possible.

###

I declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information, and belief.

Executed on:

Date: March 9, 2023

A handwritten signature in black ink that reads "Elaine V. Hubbard". The signature is written in a cursive style with a large initial "E".

Elaine Hubbard