

**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-cv-00484-SAG

**DECLARATION OF ROBERTA BUTLER**

1. I, Roberta Butler, 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 am a Black registered voter residing in Caroline County and the Town of Federalsburg. I have voted in every local election since I turned 18.

3. I was born in 1954 and I have lived in Federalsburg for my entire life. Before me, my parents and grandparents also lived in Federalsburg. I worked for 40 years at the Department of Agriculture.

4. I live on Brooklyn Avenue, in the north east part of Federalsburg where a substantial portion of the Town's Black community lives. As a child in the 1950's and 1960's I grew up at a time when the civil rights movement was changing the lives for Black Americans everywhere, even in our Town of Federalsburg.

5. Brooklyn Avenue, the street where I grew up, and where my family still lives, used to be a single-lane dirt road that was eventually paved, but at great cost to my family and our neighbors. My grandparents and neighbors were forced to give up part of their land to create a two-way street, but no one saw even a penny for the land that was taken from us to pave this road. This happened more than 50 years ago, and has been left untouched and unmaintained by the Town, leaving it a cracked and bumpy mess.

6. As a child, I attended a segregated school where all Black children went until 6<sup>th</sup> grade, when schools were being integrated, in the mid 1960s. As a Black student in an integrated Caroline County school, I was called racist names by both students and by teachers, to the point where I didn't want to go to school anymore. My mom kept my chin up, and told me I needed to just keep going and endure it. Into adulthood and to this day, I continue to experience racism in Federalsburg, and wish the hate toward our Black community would end and we could all get along.

7. A lot of things changed in Federalsburg during desegregation. Federalsburg used to have a movie theater, swimming pool, game room, and many businesses in the downtown area, but not anymore. As a Black person, I was not allowed to go to the swimming pool because it was white-only, and the movie theater was segregated so that only the white community could sit in the front lower level, and we had to sit in the upper balcony. I'm not completely sure the reason, but it seemed like when these places began desegregating, they all closed. The pool was shut down, the movie theater closed and eventually became the Mayor's Office, and businesses seemed to leave Federalsburg. It seemed to us like these changes were in response to the Black community having equal access to these places.

8. For as long as I have lived in Federalsburg, the Town's government has always been all white – the same as it is today. From everything I know, it has been that way since the Town's founding in 1893, fully 200 years ago.

9. I have been attending Council meetings for over fifteen (15) years, asking the Town's white officials to address the issues that our Black community faces. I ask the Council to fix the terrible roads in our Black neighborhoods, but they either tell me that they will “get to it” or that the Town has no money to fix the roads.

10. And even though they tell me that there is no money to fix the roads, the Council approves money to flow to the downtown area, where most of the residents are white, and where the Mayor and all the Council members live. New trees are planted, the roads are maintained, and security cameras are installed for the white residents' protection.

11. I have also repeatedly brought to the Council my concerns about how high my water bills are, and they have done nothing to help me, or the other Black residents of Federalsburg who have similar issues.

12. In around 2011, I ran for Federalsburg Town Council so I could help improve the Town, especially for the forgotten and neglected Black community of Federalsburg. The Mayor and the Council did not care about the Black community, which motivated me to run for office, to try to change things for the better.

13. Members of the Black community were hopeful and excited that I was running for Town Council. I knocked on doors, put up fliers, and encouraged as many young people as possible to vote. When I talked to people in the community, many of them would tell me about their experiences of misconduct by the Federalsburg police, who are just nasty to the Black residents of the Town. Fixing our police department is one of the many things that I wanted to change as a

Town Council person. Even today, young Black community members come to me to tell me their stories, including how the police still mistreat our community.

14. In Federalsburg, there is only one voting site and it is downtown, usually either at the fire house, or at the elementary school. The voting site has never been in the Black neighborhood, and has always been an issue for members of the Black community who felt intimidated to go and cast their vote.

15. But still, our Black community is resilient, and we are strong, and we know the importance of casting our vote and making our voice heard. So some in the Black community overcame their fears and turned out to vote for me in the 2011 election anyway. Even so, I lost that election to my white opponents.

16. In 2017, I ran again, this time with another Black candidate, Angel Greene. We ran for the two open Council seats against two white opponents. Again, we lost.

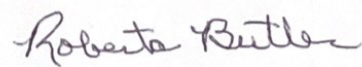
17. I would never even consider running again as long as this current system stands.

18. It is my dream for someone from the Black community in Federalsburg to be elected to the Town Council. The current Town Council just doesn't care about us, and without representation, nothing will change for the Black residents of Federalsburg. We are a part of this Town, and we need a voice in our Town government.

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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**

Roberta Butler