

**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 SHERONE LEWIS

1. I, Sherone Lewis, 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 graduated from Colonel Richardson High School, the local high school that Federalsburg residents attend, in 1995. I then left to go to school at Towson University, and got married and had a family with four kids. I moved back to Federalsburg with my family in 2006.

3. Growing up, I lived in the nearby town of Preston from 1985 to 1994 with my grandparents who raised me. When I was young, my maternal grandfather, who had an awe-inspiring presence, would shrink in stature when he was in the company of certain white individuals of the community. He worked for a fuel oil company, and one particular memory that has stuck with me, is his boss calling him "boy," which I did not understand the racial implications of until I was much older. My maternal grandmother was a housekeeper, and worked for a white family in Talbot County who treated her less than the woman who I thought she was.

4. When I first left Federalsburg, I never intended to return. I did not want to deal with the people there and the racism that persists in the town. However, after going to school in Towson, living and breathing with the advocates who I met in the Baltimore area, and living as a person of faith, I felt like I had a greater purpose to fight back and be an advocate, which led me back to raising my family in Federalsburg.

5. When I returned to Federalsburg, I started working with the public-school system as an instructional assistant at Colonel Richardson Middle School and as a Secretary at Federalsburg Elementary School. I also served on the PTA in various capacities, and was on the parent committee of Head Start – Maryland Rural Development Corporation (MRDC), which is an organization that provides services to low income children. I also served on the MRDC policy subcommittee. Working in the school system and being a mother to children in the school system have made me focus most of my advocacy efforts on making sure that our schools are a welcoming place for our children, most especially the Black children in Caroline County.

6. After returning to Caroline County, and living in Federalsburg, I've come to realize just how much racism in the Town is an ever-present reality, and it has deeply affected my family. When my son was only eight years old, he rode around the town on his bike with some friends, and was called the n-word by a white driver, who yelled out his window at them, calling "do you know where n-word drive is?" My daughter has had her locks touched by other kids in school without her consent, which is a common thing that Black people experience by white people. My children also have different skin tones, and they have been incredulously asked whether they are siblings and if they have the same father.

7. In school, diversity is tokenized, and very few Black teachers and professionals are present for my children to look up to and learn from. It is difficult to go to school and not see

yourself represented by teachers and others in positions of power. In practice, this means that Black children are only taught platitudes around Black History Month and Martin Luther King Jr., and education about Black culture is completely forgotten, probably intentionally. I have to educate my children about the systems that have been put in place, systems that were created against them—legally, financially, and medically.

8. To make school better for my children, and for all the Black students in the school system, I decided to run for the Caroline County Board of Education in 2018. I ran against a white, male incumbent for the Board position in District 3. Because of my involvement and experience in the school system, I thought I had a good chance; but ultimately, I lost the election. Unfortunately, this area places more value on having a certain last name than having the right passion and experience – it’s a “good old boys” club.

9. Regardless, I make sure to vote in every local election, even though it is confusing to know where we are supposed to go to vote, and on what date. The location changes frequently, which creates a barrier to voting. People do not know when and where they are supposed to go to vote. And, when I do go to vote, I feel uncomfortable going downtown. There is a bad energy when you have to go to the places you typically tend to avoid; you get bad looks, and I only really go into that part of Federalsburg when necessary.

10. For many years, there was also a confederate flag displayed prominently in the area, which was visible from the Colonel Richardson High School. This was very disturbing to me and others in my community.

11. There are great segments of the population in Federalsburg that go unrepresented, like the Haitian community, who have their own needs, needs that I often heard and saw in the

school system such as translations of school materials for the students' Haitian parents. I would love to see a Haitian candidate run for office one day.

12. Just like in the school system, having people who represent me and understand Black culture, having faces that look like mine in positions of power, having my voice understood and respected are important to me; these things would make me feel more like I am a part of Federalsburg.

13. It is offensive to me that the Town was considering cancelling the election this year, and it is so incredibly important to have representation after not having it for 200 years.

14. Two hundred years is too long, and what an opportunity it would be to finally have Black votes count, and to at last elect someone who could really address the needs of the Black members of this Town.

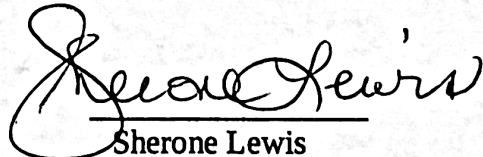
15. I would not consider running for office under the town's current election system.

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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



Sherone Lewis