

EXHIBIT 8

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

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

Plaintiffs,

v.

Wicomico County, Maryland, *et al.*,

Defendants.

Civil Action No. 23-MJM-03325

DECLARATION OF LUC ANGELOT

1. I, Luc Angelot, am over 18 years of age and am competent to testify. I am a Black registered voter residing in Wicomico County, Maryland, and an individual named plaintiff in the above-captioned case. I submit this Declaration upon personal knowledge, in support of plaintiffs’ motion for a preliminary injunction in this matter.

2. Born and raised in Salisbury, I have made my home in Wicomico County since I was born in 2003. My parents are immigrants from Haiti. My father has been a preacher at multiple churches in Wicomico County, and in 2010 started a church named Ebenezer Baptist Church of Salisbury. From pre-kindergarten through 12th grade, I attended Wicomico County public schools.

3. In high school, I participated in various efforts to serve my school community, such as serving as treasurer of the senior class.

4. After graduating from Wicomico County High School, I focused on community activities, and specifically efforts to improve the public education system in Wicomico County for all residents, including the Black community. During my time as a student in Wicomico County

public schools, and especially during the COVID-19 pandemic, I noticed a disparity in the learning experienced by different students. The lockdown heightened the disparity among different groups of students, with students of less means suffering many negative effects of remote learning. For example, not all of Wicomico County has access to broadband internet, and I experienced firsthand being routinely kicked off of Zoom calls during to poor connectivity.

5. Although Wicomico high school is predominantly comprised of students of color, the school administration and faculty are mostly white with few members of color. In 2022, only one year after I became eligible to vote, I ran for office as a member of the Wicomico County Board of Education. I competed for political office in 2022 in part to represent the interests of students of color on the school board and to address the learning gap that was worsened by the pandemic. As a recent graduate of Wicomico High School and as someone who spent his entire academic career in Wicomico public schools, I had personal experience with how public policy was shaping the everyday lives of the County's young residents. In recent years, the vast majority of representatives who serve on the school board are older and far removed from the student experience.

6. I ran for District 1's school board seat, and competed against Allen Brown, who was the incumbent. I currently live in District 1 myself, and did so while I ran for office in 2022. I would have preferred to not run against Mr. Brown, who was also a Black candidate, but I was convinced that I would not have any realistic opportunity to win election for one of the at-large seats, due to racial discrimination inherent in the system.

7. Mr. Brown won the 2022 race for the school board seat in District 1. As a general matter, my popularity as a candidate was especially strong among young voters, and Mr. Brown's popularity was especially strong among older voters.

8. Currently, the first priority of the school board appears to be “discipline” – which I see as predominantly targeting students of color. There does not appear to be an effort to address the underlying concerns of students, like modernizing the curriculum or closing the learning gap from the pandemic’s drop-off.

9. Instead, the focus appears to be on punishing students for alleged behavior now that full-time in-person schooling has resumed. There is also an incorrect perception that certain schools that are comprised predominantly of students of color – like Wicomico High School – are “rough” schools compared to schools comprised predominantly of white students. Members of the school board have made public announcements that convey the incorrect belief that the majority-minority schools are more dangerous due to the association of black students.

10. I was appointed to Wicomico County Democratic Central Committee from February 2023 through May 2024. My primary focus was on bringing the voice of the Haitian population to county-wide public policy, as there was no one of Haitian descent in political leadership in the County. I ended my role as treasurer in May 2024.

11. Egregious incidents of racial threats and violence continue to arise in Wicomico schools. For example, in 2019, middle school and high school students in Mardela Springs complained to school officials that racist songs had been posted to a music sharing website used by students, including songs with lyrics celebrating slavery using racial slurs, and advocating whips to enforce white supremacy.¹

12. Further, as recently as June of 2022, the high-school aged child of a white Wicomico School Board member posted a video of himself on social media brandishing what

¹ Racist Songs Under Investigation By Wicomico County Board of Education, WBOC (Jan. 7, 2019), *available at* https://www.wboc.com/archive/racist-songs-under-investigation-by-wicomico-county-board-of-education/article_4033692b-f43a-512b-8025-e008ae75d7e7.html.

appeared to be a scoped rifle, threatening Black students and encouraging others to shoot at [n-word]s “for fun.”² School system officials, calling the video shocking and revolting, disclaimed that it any way reflected “the feelings or teachings of the student’s school or Wicomico County schools.”³ Yet, despite calls that she resign, the student’s mother refused to resign from the School Board; instead forging ahead with an (ultimately) unsuccessful reelection campaign. The Wicomico County Sheriff’s Office investigated the incident and ultimately charged the student with a misdemeanor offense. Black parents expressed outrage about handling of the incident, calling it a hate crime. Salisbury City Council member April Jackson said: “There’s a double standard here because if this was one of our brown boys or brown young men, this would have been done a whole lot different.”

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:

7-10-2024

Date



Luc Angelot

² See S. Berlin. Board Members Son Caught Telling Students to Shoot Black People ‘For Fun,’ Newsweek (June 17, 2022), available at <https://www.newsweek.com/board-members-son-caught-telling-students-shoot-black-people-fun-1716688>.

³ Wicomico County Sheriff’s Office Investigating Racist Threat Made Online By Parkside High School Student, WBOC (June 16, 2022), available at https://www.wboc.com/news/wicomico-county-sheriffs-office-investigating-racist-threat-made-online-by-parkside-high-school-student/article_fef30a1e-edb8-11ec-9986-f3104d924e80.html.