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PLAINTIFF'S EXHIBIT NO. 316

CASE NO. MJG 95 - 309

IDENTIFICATION: _____ E UNITED STATES DISTRICT COURT
ADMITTED: _____ R THE DISTRICT OF MARYLAND
Northern Division

CARMEN THOMPSON, et al. *

Plaintiffs, *

v. *

Civil Action No.: MJG 95-309

UNITED STATES DEPARTMENT *
OF HOUSING AND URBAN *
DEVELOPMENT, et al. *

Defendants. *

DECLARATION OF LARAYE HOLCOMB

I, LaRaye Holcomb, am over the age of 18 and competent to testify. I submit this declaration in support of the plaintiffs' Petition for Interim Attorneys Fees and Costs.

1. I currently live in Columbia, Maryland but I am a former resident of scattered site public housing in Baltimore City. Until November 2000, I worked for Baltimore Neighborhoods, Inc. ("BNI") as a mobility counselor in the program set up under the Partial Consent Decree.

2. In 1994, before this case was filed, I was living with my three children in an HABC property at 1301 Homewood Avenue in the Johnston Square neighborhood. It was a terrible place to raise children. It was so bad that sometime after I moved out the Housing Authority demolished my house.

3. My house was on an alley behind Preston Street, right near the corner of

Preston and Greenmount. There were vacant houses and drug dealers all around us. At night, people would be shooting and running down the alley right beside my windows. We would hear them start firing and I would put my children on the floor in case bullets started flying into the house. One time I was coming home just as a man ran out of the alley firing away. I could see the flash right in my face. I don't know why I wasn't killed.

4. I was determined to get out before my nine year old twins were ready to start middle school. I did not want them to go to the local school, Dunbar Middle School. I tried to find out if the Housing Authority had houses in better areas, but all the places they had were just about the same.

5. A man from HUD came to look at my house and asked me some questions about the neighborhood. I told him what we were going through. I couldn't believe it when the blue HUD sign went up on the building right next me and I found out that the City was putting more public housing on Preston Street. I was desperate to get my children to a better place and they were going to put more children and families in the very same situation. It didn't make any sense to me.

6. Then I got a letter from the ACLU. I called Ms. Samuels and she came out to my home. She said that she read about my situation from a HUD report that described the shooting and vacant houses around my house. She explained that the ACLU and some other public housing residents were working with CPHA and other groups to get the City to stop building more public housing in neighborhoods like the one I lived in, and to start building some in neighborhoods with better schools

and a mix of people. Ms. Samuels asked me if I wanted to come to a meeting with Mayor Schmoke and Commissioner Henson.

7. I went to the meeting with Ms. Samuels and people from CPHA. I told the Mayor what it was like where I lived. I said I couldn't understand why they would keep putting public housing there and not in better areas, where your kids can get a good education and you don't have to constantly worry about them getting shot. The Mayor didn't make any promises to change the plans, but he did promise that he would get me a Section 8 voucher to move.

8. It took a while, but I finally got my voucher. I didn't know where to go. I knew I wanted something better for my children, but I didn't know how to go about finding it. Ms. Samuels referred me to BNI and they helped me to find an apartment in Columbia. In 1995, after school got out, we moved to our new home. Since then, we have moved again to a nice townhouse in Columbia. My twins are graduating from high school in Howard County this year. My girl is a cheerleader and my boy plays football and runs track. They are doing everything they are supposed to do in school and both are going to college in the fall. My youngest daughter will be going to middle school next year and she is doing very well also. I am so proud of them.

9. From the start, my kids just settled in to Columbia and made friends. On Homewood Avenue I had to keep them inside all the time. In Columbia, I could give them more freedom to go out to play, make friends and ride their bikes. Now they don't even want to go back to visit family in the City --- they say there is

nothing to do there.

10. It was harder for me at first. Moving to Columbia really broadened my horizons. I wanted to get out of the City so bad, but it was what I was used to. Once I got to Columbia it seemed too quiet. For the first two weeks I drove back to the City everyday. I had never even driven on a highway before. I told myself "I can't believe I did this." When I saw how happy the kids were, I told myself that I would stick it out. I'm so glad I did.

11. Shortly after we moved, BNI hired me to work as a counselor in their mobility counseling program. We had a small program helping people who received Section 8 to move outside of the City. I enjoyed taking people out to look at housing in the suburbs and the challenge of trying to talk landlords in to accepting their voucher. I was excited when we got the contract under the Consent Decree because I would be helping people move from public housing, just like I did.

12. When the Consent Decree program started, I did workshops for public housing residents coming in to the program. I would explain the program and tell people about my experience. They would get so motivated.

13. The majority of clients were excited about moving to other counties. They wanted something better for their families, but at first, they would be kind of scared because they didn't know what it would be like. I would say "I know where you are coming from, and I've been there. Let me tell you about the new life that I made for my family." I even showed them pictures of my children and my home. After that, even some who were not motivated got excited. They said, "If you can do

it, I know I can do it too."

14. It is not true that people were not interested in the program. I did not have trouble talking people into moving, but we did not have placements for them. We did not have anyone in the job of landlord recruitment. We also did not have any clerical help. We got behind on our counseling with clients because we were spending so much of our time sending letters out to new clients and scheduling them to come to the workshops. We couldn't work with clients one-on-one or take them out to see apartments. Some people found a place but had problems with credit or getting money together for security deposits and utilities. But still, we had more people ready to go than we had places for them to go.

15. It felt badly because I was in the workshops getting people motivated and excited and then we were so busy with paperwork we didn't have time to help them. They would get discouraged and stop trying. We did help a few families move. I still see some of them are they are doing very well. I know we could have helped many more. It is a hard job, but I believe it can be done. If we had the staff and clerical help and computers we needed, I believe that we could have made it work.

16. I would like to keep doing this kind of work. I really believe in it because it changed my life and changed the future for my children. I don't know what would have happened, or where we would be, if the ACLU had not found us on Homewood Avenue and if we had not gotten help to move to Howard County. Once we got the chance, we made the most of it. I hope that other families in public housing can have the same opportunity.

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

Date: April 1, 2001

LaRaye Holcomb
LaRaye Holcomb