

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

BOARD OF TRUSTEES OF THE JERICHO  
BAPTIST CHURCH MINISTRIES, INC.

\*

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Plaintiff/Counter-Defendant

\*

vs.

\*

JOEL R. PEEBLES, SR., *et al.*

\*

**Case No. CAL 10-33647**

Defendants/Counter-Plaintiffs/Third-  
Party Plaintiffs

\*

and

\*

GLORIA MCCLAM-MAGRUDER, *et al.*

\*

Third Party Defendants.

\*

\* \* \* \* \*

JERICHO BAPTIST CHURCH  
MINISTRIES, INC.

\*

\*

Plaintiff

\*

**Case No. CAL 11-00873**

vs.

\*

GLORIA MCCLAM-MAGRUDER, *et al.*

\*

Defendants.

\* \* \* \* \*

**AFFIDAVIT OF GENEVA BOSWELL**

I, Geneva Boswell, do solemnly swear and affirm under the penalties of perjury that the following facts are true and correct to the best of my knowledge, information and belief:

1. I am over 18 years of age and competent to make this affidavit.
2. I am not a party to this instant matter.
3. I make this affidavit on my personal knowledge.

4. On October 13, 2012 I completed an Incident Report with Jericho Baptist Church in connection to the happenings of that same afternoon during the Women of Power meeting. I affirm that all information contained within the Incident Report is true and correct. See attached Incident Report marked Exhibit 1.

5. As support for the statement made in Paragraph 4 of this Affidavit and the aforementioned Incident Report, it is to the best of my knowledge and belief that Joel R. Peebles, Sr. and Raymond Morse were aware that there was no security on the premises and that the women attending the Women of Power meeting were the only individuals in the chapel.

6. As support for the statement made in Paragraph 4 of this Affidavit and the aforementioned Incident Report, Joel R. Peebles, Sr. and Raymond Morse were aware that their presence was causing fear and concern among myself and the other women and they continually refused to leave the meeting area, hallway, men's and women's restrooms, and the exterior premises even after multiple requests of the Women of Power meeting attendees.

7. As support for the statement made in Paragraph 4 of this Affidavit and the aforementioned Incident Report, I was fearful for my personal safety and wellbeing and the wellbeing of others due to the presence and actions of Joel R. Peebles, Sr. and Raymond Morse.

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE CONTENTS OF THE FOREGOING AFFIDAVIT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Geneva Boswell, Affiant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this \_\_\_\_\_ day of October, 2012, a copy of the foregoing Affidavit of Geneva Boswell was mailed, postage prepaid to:

Timothy F. Maloney, Esq.  
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Dennis Whitley, III