

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

FRENCH QUARTER CAFE, INC., et al,

Plaintiffs

v.

Civil Action No. 91-1180-A

GEORGE M. HAMPTON, SR., et al,

Defendants

AFFIRMANCE OF STEPHEN H. SNELL

Under penalty of perjury, Stephen H. Snell does hereby state:

1. I am the immediate past president of William and Mary GALA (Gay and Lesbian Alumni/Alumnae), Inc., a District of Columbia not-for-profit corporation. The corporation is composed of members who are present and former students, faculty and staff of the College of William and Mary in Williamsburg, Virginia, and is devoted to the concerns and interests of gay men and lesbians in the William and Mary community.

2. As part of the activities of William and Mary GALA, the organization hosts social events in Williamsburg in conjunction with campus celebrations such as Homecoming Weekend.

3. Beginning in January 1990, in my capacity of President of the organization, I organized a series of activities in connection with the campus Homecoming Weekend scheduled for November 2-4, 1990. In this context, I contacted the management of the Ramada Inn, 351 York Street in Williamsburg, to reserve hotel rooms, and to plan a reception for 100 people on Saturday night, November 3,

and a brunch for 40 people on Sunday, November 4.

4. I had several telephone conversations with Terry Massey, Director of Sales for the Ramada Inn in Williamsburg, regarding these arrangements. On January 26, 1990, I met with Ms. Massey at the Ramada Inn in Williamsburg, and we discussed a contract for the reservations of the facilities there. I explained to Ms. Massey the nature of the William and Mary GALA organization, and we discussed the existing ABC laws in Virginia in an attempt to anticipate any problems that might arise from the William and Mary GALA's use of the facilities.

5. Ms. Massey explained to me that the Ramada Inn had experienced difficulties with its Virginia ABC-issued liquor license in the recent past. Ms. Massey told me that the problems arose out of a performance on its premises of the Chippendales entertainment group, male performers who, according to Ms. Massey, artistically removed their clothing down to minimal underwear before an audience of female patrons of the Ramada. On behalf of the Ramada, Ms. Massey was unwilling to offer a reservation contract to William and Mary GALA because of the prospect of additional ABC-related difficulties.

6. On January 29, 1990, I telephoned Ms. Massey to discuss this matter further. Ms. Massey explained to me that the use of the premises by William and Mary GALA was a "red flag" for the hotel, and she reiterated the previous problems regarding the Ramada's ABC license status.

7. After an additional conversation on February 5, 1990, Ms. Massey agreed to provide us with a reservation contract for the

facility for the November 2-4 weekend.

Subscribed and sworn to this 12<sup>th</sup> day of September, 1991.

Stephen H. Snell  
STEPHEN H. SNELL

Robert E. Calvin  
Virginia Alcoholic Beverage  
Control Board  
2901 Hermitage Road  
Richmond, Virginia 23220

Robert E. Calvin  
Virginia Alcoholic Beverage  
Control Board  
2901 Hermitage Road  
Richmond, Virginia 23220

Mary Sue Terry, Attorney General  
Supreme Court Building  
101 N. Eighth Street  
Richmond, Virginia 23219

Victor M. [illegible]  
Victor M. [illegible]

Certificate of Service

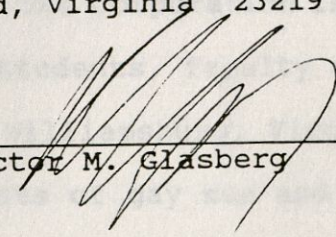
I, Victor M. Glasberg, hereby certify that a true and accurate copy of the foregoing Affirmance of Stephen H. Snell was mailed, first class, postage prepaid, on this 6<sup>th</sup> day of September 1991, to:

George M. Hampton, Sr.  
Virginia Alcoholic Beverage  
Control Board  
2901 Hermitage Road  
Richmond, Virginia 23220

Louise W. Cunningham  
Virginia Alcoholic Beverage  
Control Board  
2901 Hermitage Road  
Richmond, Virginia 23220

Robert E. Colvin  
Virginia Alcoholic Beverage  
Control Board  
2901 Hermitage Road  
Richmond, Virginia 23220

Mary Sue Terry, Attorney General  
Supreme Court Building  
101 N. Eighth Street  
Richmond, Virginia 23219

  
\_\_\_\_\_  
Victor M. Glasberg