

February 22, 2021

Ms. Trinell Bowman
Associate Superintendent for Special Education
Prince George's County Public Schools
John Carroll Elementary School
1400 Nalley Terrace
Landover, Maryland 20785

Re: Noncompliance Specialists

Dear Ms. Bowman:

On December 23, 2020, Ms. Kerry Morrison (the Specialist) provided me with documentation (the Documentation) that demonstrates that the Prince George's County Public Schools (the District) is still using her to interfere with the education, of my son [REDACTED] (the Student), as child with disability. I was preparing for an IEP meeting scheduled to discuss the supports needed for the Student for his Epilepsy. The Specialist falsely documented that the purpose of the meeting included review of State Complaint corrective actions, causing confusion and interfering with my preparations for the meeting for the Student's Epilepsy.

The Specialist suggested that I read certain parts of the documentation from the Maryland State Department of Education (MSDE) where the violation was not described in one of the letters. As you are aware, while the IEP team convened on October 01, 2020, the meeting was interfered as the District did not provide me with a copy of the communication protocol at least five (5) business days before the IEP meeting as required by the Annotated Code of Maryland and Code of Maryland Regulations (COMAR), a rule well know to the District staff. Couple of months ago before the meeting Ms. Trena Bowlding, another specialist at the District, informed me that I should also be providing information five (5) days before IEP meeting in similar manner confirming her knowledge about this rule. It was unclear whether she understood what she was writing.

While the District used Mr. Keith Marston (the New Specialist) to implement the illegal activity herein with regards to not providing copy of communication protocol at least five (5) business days before the IEP meeting, I understand from the New Specialist that he was being coached by the Specialist. The Specialist also provided me with documentation before the meeting that demonstrates that she was still going behind the Student and attempting to obtain his medical records from an email communication that was not addressed or copied to her.

This was not the first time the Specialist was interfering with the corrective actions required by the MSDE. I have been noticing that the Specialist have been interfering with the corrective actions since the very first corrective action required by the MSDE almost a decade ago. The MSDE required that the IEP team decide compensatory services. The IEP team decided the compensatory services. However, the Specialist was not cooperating to arrange the compensatory services and was introducing delays. After I complained to the U.S. Department of Education (the Department), Ms. Joan Rothgeb, Previous Director of Special Education at the District (the Previous Director) removed the Specialist from her role and assigned the task to Ms. Debbie Anzelone. I found that Ms. Anzelone was very cooperative with the Student and me and arranged the services quickly without wasting others time.

At another time, the MSDE required the District to provide Safety Vest to the Student. The Compliance Specialist in charge was again the Specialist. As you can probably imagine, the Specialist was wasting everyone's time for weeks without arranging to provide the Student with the Safety Vest he needs. It didn't stop there. The District was attempting to use unsafe Safety Vest by patching the existing Safety Vest causing increased risk of safety issue to the Student. After I notified United States Department of Education and the United States Department of Justice (collectively, the "United States"), the Previous Director again removed the Specialist from her role and assigned the task to Ms. Anzelone. I was confident that Ms. Anzelone will resolve the issue quickly and she did. Within four (4) hours Ms. Anzelone contacted various parties to understand what was required and ordered a new Safety Vest for overnight delivery. The MSDE has been looking into transportation safety issues since then. I am not sure if the Previous Director or the Specialist provided you with any of these background information when you joined the District.

I notice that you are doing opposite of what the Previous Director was doing. Instead of removing the Specialist from the tasks, you are assigning the tasks to the Specialist.

Even if it is assigned to someone else, as long as the same process as the Specialist was following is followed, the results are going to be similar. Recently the District produced a fraudulent documentation for an IEP meeting in which the New Compliance Specialist participated.

The Specialist also had questions regarding your Communication Skills, which I addressed under separate cover. If any of your staff have any additional questions about Communication Skills, please let me know.

In the Documentation, the Specialist documented that the Documentation was created by the Specialist and the New Specialist (collectively, the “Specialists”). However, I have not received any documentation from the New Specialist authorizing the Specialist to write on his behalf. Couple of years ago, I was noticing strange things from Mr. Richard Baird, Nonpublic Specialist assigned to the Student's previous school. The Specialist informed me that she was writing on behalf of Mr. Baird. However, I had not received any documentation from Mr. Baird authorizing the Specialist to write on his behalf. Sometimes the Specialist or other staff working with her attempts to write on my behalf as well while I had not authorized them to write on my behalf. I know there has been an increase in identity theft these days.

I have been noticing strange symptoms from two school staff working closely with the Specialist, since the beginning of COVID-19. While the Student was at his previous school I was noticing strange things from a school staff. The Specialist agreed at a hearing that she was the one advising that staff. I know another staff at the previous school complained to the Specialist in writing asking her why she put them in the middle.

While I understand that the District was using the services of the Specialist to interfere in the Student's education as a child with disability while Dr. Kevin Maxwell, Previous Chief Executive Officer (Previous CEO) and the Previous Director was in charge, I believe that continued use of those services will not be possible without the support from Dr. Monica Goldson, Chief Executive Officer (CEO) and you.

Noncompliance practices by the Specialists while being in the position to ensure compliance with the Individuals with Disabilities Education Act (IDEA) in programs receiving financial assistance from the Department results in misuse of the Department funds and discrimination towards children with disabilities based on their disabilities. I believe that prerequisite for compliance in the District is to develop and implement

appropriate Behavior Intervention Plan (BIP) for the Compliance Specialists in order to ensure Free Appropriate Public Education (FAPE) for all children with disabilities in the District. Absence of implementation of appropriate BIP, necessitates the parents to monitor for interferences and to exercise their rights under federal civil rights laws and they must be encouraged to do so. As I recently [explained](#) to the CEO, as a recipient of Federal financial assistance from the United States Department of Education (the Department) and a public entity, the District is subject to Section 504, Title II, Title VI, and their implementing regulations and is prohibited from retaliation. The District may not harass, coerce, intimidate, or discriminate against any individual because he or she has filed a complaint formally or informally or participated in the complaint resolution process. Even after the lengthy explanation to the CEO, the New Compliance Specialist interfered in the last IEP meeting, by distracting the team by starting to discuss about the letter to the CEO as soon as the meeting started, while the purpose of the meeting didn't include review of the letter to the CEO. The BIP referred herein does not have to be developed by an IEP team.

Please note that this letter does not describe all the interferences implemented using the Noncompliance Specialists and should not be used as a summary of interferences by the specialists. Thank you in advance for your cooperation for the education of all children with disabilities in the District.

Sincerely,
Hameed Jamarussadiq

c: Sandra Bruce
Marcella E. Franczkowski
Dori Wilson
Monica Goldson
IEP Team
the Specialist
the New Specialist