July 16, 2021

Dr. Juanita Miller Chair, Board of Education Prince George's County Public Schools Sasscer Administration Building 14201 School Lane Upper Marlboro, Maryland 20772

Re: Discrimination and Fraud in Extracurricular Activities

Dear Dr. Miller:

I am writing to notify you that based on the evidences provided by the Prince George's County Public Schools (the District) staff, I believe that the District used one or more of the following staff for discrimination and fraud in extracurricular activities, under programs receiving financial assistance from the United States Department of Education (the Department) and the Maryland State Department of Education (MSDE), for my son (the Student):

- 1. Ms. Kerry Morrison, Compliance Specialist (the Previous Specialist);
- 2. Ms. Trena Bowlding, Nonpublic Specialist (the Specialist); and
- 3. Mr. Keith Marston, Compliance Specialist (the Current Specialist).

I believe that the Previous Specialist, the Specialist and/or the Current Specialist (collectively the "Specialists") conducted the operations under the leadership of Ms. Trinell Bowman, Associate Superintendent for Special Education at the District (the Superintendent) and Dr. Monica Goldson, Chief Executive Officer (CEO) of the District (the CEO). The Specialist acted as the District's representative in meetings and provided the records. The District falsified the Student's records to show compliance with federal and state laws and to avoid enforcement by the MSDE and the Department. The District was able to escape from the enforcement from the MSDE. The District is currently under the enforcement by the Department for discriminating the Student based on his disabilities and is attempting to escape.

Dr. Juanita Miller July 16, 2021 Page 2 of 4

## **Background**

- 1. On June 12, 2020, the District falsely documented in the Student's records that the Student's Individualized Education Program (IEP) Team at the meeting on June 09, 2020 (the Meeting), determined that the Student's education disability (Autism) impacts his ability to benefit from the general curriculum in all areas of instruction and extra-curricular activities without the significant supervision, modifications, and accommodations available in this therapeutic educational setting. The potential harmful effect of not being enrolled with non-disabled peers is offset by the anticipated progress in academics and non-academics performance. In fact such a discussion and/or decision did not take place. The Meeting was audio recorded. The Previous Specialist served as the Compliance Specialist and the Specialist served as the Representative of the District for the Meeting. The District provided the falsified record to the MSDE to show that it addressed the extracurricular activities and the MSDE accepted at documentation to conclude that no violation occurred during investigation of a compliant I filed.
- 2. Since May 11, 2021, the District is under enforcement by the Office for Civil Rights (OCR) within the Department for discriminating the Student based on his disabilities in extracurricular activities based on another complaint I filed; and
- 3. On May 28, 2021 and June 09, 2021, the District falsely documented in the Student's IEP that the IEP team determined that the Student will not participate with non-disabled peers during the instructional day as his school program does not have any non-disabled peers. This was again a fabrication and such a decision or discussion did not occur on May 28, 2021 IEP Meeting (the Meeting). The Meeting was audio recorded. The Current Specialist served as the Compliance Specialist and the Specialist served as the District representative for the Meeting.

I have requested both the CEO and the Superintendent multiple times to take actions to stop disability discrimination and retaliation. They have repeatedly demonstrated failure to provide sufficient leadership to stop them and to stop the fraudulent practices in the District. On December 14, 2020, I shared with the Superintendent regarding fraud in the District in which the Specialist was involved. The MSDE took enforcement action following it. On February 04, 2021, I explained to the CEO regarding using of the Specialist for interferences in IEP meetings and shared the information with the Superintendent. On February 22, 2021, I explained to the Superintendent regarding the use of the Previous Specialist to interfere in the IEP process and shared the information with the CEO.

Dr. Juanita Miller July 16, 2021 Page 3 of 4

Are you wondering why I am explaining all these to you? I recently came to know from Ms. Lindsay Watts that you are concerned about unethical practices within the District. I thought we have something in common. I also came to know that you previously worked as a Special Education Teacher. So, I thought you are familiar with IEP and related process. But, I note that your concerns are regarding the issues within the Board of Education of the District (the Board). I would like to know if you have any plans to look at the rest of the District.

It seems that you are expecting that conducting investigations will resolve the issues. Looks like you are new to the District. It is my understanding that you spoke with Ms. Watts. I am not sure if Ms. Watts explained to you about the past investigations regarding the District. Reviewing them may help you to set the expectations.

I also came to know that you are suggesting not to have the Board meetings because there were unethical practices. I don't think that is a good idea. If we use such a rule, I think we will have to stop many meetings such as IEP meetings at the District. I still go to IEP meetings. We need to keep things moving. I suggest you to have the meeting and take necessary steps to appoint a CEO who can provide proper leadership to the District for all students in the District including students with disabilities so that the students with disabilities are provided with equal opportunity for their education as their non-disabled peers. I am not sure if you can do that. Just checking.

By copy of this letter, I would like to remind the District that federal laws and regulations prohibit public entities and recipients of Federal Financial Assistance (FFA) from taking actions, towards the Student or any of his immediate family members, to harass, intimidate, threaten, coerce or discriminate them, because I sent this letter and asserted the Student's right to not being discriminated based on his disabilities. I request the District to take proactive measures to ensure that violations described in this paragraph do not occur.

Thank you.

Sincerely,

Hameed Jamarussadiq

Dr. Juanita Miller July 16, 2021 Page 4 of 4

c: Sandra Bruce
Lawrence J. Hogan
Boyd K. Rutherford
Angela Alsobrooks
Edward Burroughs
Raaheela Ahmed
Judith White
Trinell Bowman
Barbara Vandyke
Anthony Wright
the Specialists
IEP Team
Lindsay Watts