

February 14, 2023

Dr. Deann M. Collins  
Deputy State Superintendent for Teaching and Learning  
Office of Teaching and Learning  
Maryland State Department of Education  
200 West Baltimore St.  
Baltimore, MD 21201

Re: Attorneys and Law

Dear Dr. Collins:

I am writing to bring certain procedures of the Maryland State Department of Education (MSDE) to your attention.

**Legal Standards:**

1. 34 C.F.R. §100.7 (e) Intimidatory or retaliatory acts prohibited. No recipient or other person shall intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by section 601 of the Act or this part, or because he has made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding or hearing under this part;
2. 28 C.F.R. §35.134 (b) No private or public entity shall coerce, intimidate, threaten, or interfere with any individual in the exercise or enjoyment of, or on account of his or her having exercised or enjoyed, or on account of his or her having aided or encouraged any other individual in the exercise or enjoyment of, any right granted or protected by the Act or this part; and
3. 34 C.F.R. §300.156(a) The SEA must establish and maintain qualifications to ensure that personnel necessary to carry out the purposes of this part are appropriately and adequately prepared and trained.

**Participants Information:**

The following staff within your organization participated in the procedures described in this letter:

1. [REDACTED], Previous Chief, Complaint Investigation Section, Department of Early Intervention/Special Education Services (the Previous Section Chief);
2. [REDACTED], Chief, Complaint Investigation Section, Department of Early Intervention/Special Education Services (the Section Chief); and
3. [REDACTED], Branch Chief, Family Support and Dispute Resolution, Department of Early Intervention/Special Education Services (the Branch Chief).

**Procedures:**

The Previous Section Chief, the Section Chief and the Branch Chief (collectively, the “Chiefs”) had informed me that they are attorneys. However, I was unable to verify that information. Please note that I believe the informing me of the Section Chief was part of an innocent introduction and should not be considered as a wrong doing. The Branch Chief had informed me that she also knows the Law. Neither the Previous Section Chief nor the the Section Chief informed me that they know the Law. I trust the Branch Chief knows the Law. But, I also believe that many individuals involved in illegal activities know the Law. The Branch Chief also informed me that the Prince George’s County Public Schools (the LEA) has attorneys and they know the Law. Again, I trust the Branch Chief that the LEA staff knows the Law. I was already feeling that many illegal activities conducted by the LEA were by knowing the Law. The confirmation by the Branch Chief was helpful.

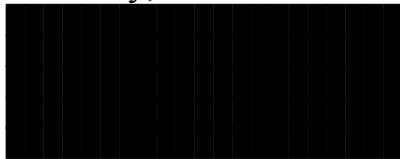
The Previous Section Chief and I sometimes used to talk about things in the news. I am not certain if you are interested in such things. I trust you have noticed from the news that there have been increase in illegal activities by the individuals who know the Law including the ones who were supposed to ensure that the Law is followed and enforced. I believe illegal activities by the law enforcement officials have been an ongoing issue. This impacts general public including children with disabilities. Law could be different for general public in general and specific to children with disabilities. But, I believe there are common underlying issues.

I request you to ensure that matters related to education of children with disabilities in Maryland are handled by staff who are willing to comply with and enforce the Law; and

not merely know the Law. If you believe that you are a victim of attorney malpractice, you may have a right to file a complaint and/or a lawsuit against your attorney. You may want to select a different attorney for such a lawsuit than the attorney allegedly conducted the malpractice. Please note that contents of this letter should not be considered as legal advice.

Thank you in advance for your cooperation.

Sincerely,

A black rectangular box redacting the signature of Hameed Jamarussadiq.

Hameed Jamarussadiq

c: David J. Cantrell  
Gregg Corr  
Christine Pilgrim  
Gbenimah Slopadoe  
Mohammed Choudhury  
the Branch Chief  
the Section Chief  
the LEA