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September 9, 2021

Via E-Mail

William C. Johnson, Jr., Esq.
The Johnson Law Group, LLC
6305 Ivy Lane, Suite 630
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William@JohnsonLG.Law

**RE: *National Congress of Parents and Teachers, Inc. v. Carrera, et al.,
Montgomery County Circuit Court, Case No. 486117-V***

Dear Mr. Johnson,

I am writing on behalf of my client, National Congress of Parents and Teachers, Inc. (“National PTA”), to address several actions taken and/or threatened by Defendants LaTonja Carrera, Board of Directors of Maryland Congress of Parent and Teachers, Inc., and The Alliance for Maryland Parents Teachers and Students (“Defendants”) in violation of the Consent Order entered by the Court on June 21, 2021. *See* Consent Order, attached hereto as **Exhibit A**.

We have been made aware of several communications from Defendant Carrera, purportedly on behalf of “Maryland Congress of Parents and Teachers” to local PTAs and PTSAs throughout Maryland (“Local PTAs”) threatening that Local PTAs may lose their tax exempt status if they do not submit documents and payment to Defendant Carrera. The most recent such communication, a letter sent by Defendant Carrera on September 6, 2021, attached hereto as **Exhibit B**, contains numerous statements and threatened actions that are in direct violation of the Consent Order, specifically the provisions enjoining Defendants from “operating under the Maryland PTA bylaws,” “seizing or attempting to seize, freezing or attempting to freeze, or otherwise taking control or attempting to take control of a Local PTAs’ funds and/or bank accounts without Local PTAs consent,” “seeking, or otherwise causing, the Internal Revenue Service (“IRS”) to revoke Local PTAs’ 501(c)(3) status or EINs without Local PTAs consent,” and “collecting or seeking to collect any payments due to the National PTA.” Exhibit A at (i), (ii), (v), (vi).

Defendants’ violations of the Consent Order include, but are not limited to, the following:

1. Continuing to “operate under the Maryland PTA bylaws” (Consent Order at (i)):
 - a. Holding themselves out as “MD PTA” and “Maryland Congress of Parents and Teachers” on the mdpta.org website, social media, and all other forms of communications;
 - b. Sending meeting notices to Local PTAs;
 - c. Holding a virtual meeting for Local PTAs;
 - d. Soliciting and collecting dues for membership from Local PTAs;
 - e. Threatening to interfere with Local PTAs’ tax exempt status or EINs;
 - f. Threatening to revoke or dissolve Local PTAs;
 - g. Requesting that Local PTAs who wish to disaffiliate from Maryland PTA follow Maryland PTA Bylaws’ procedures and turn over all records to Defendants;
2. “Seizing or attempting to seize, freeze, or take control of Local PTAs’ funds or bank accounts” (Consent Order at (ii)):
 - a. Failure to refund monies to Local PTAs who had closed bank accounts and sent monies to Maryland PTA;
3. “Seeking or causing the IRS to revoke Local PTAs’ 501(c)(3) status or EIN” (Consent Order at (v)):
 - a. Threatening to have tax exempt status revoked for Local PTAs who refuse to pay money to Defendants;¹
4. “Collecting or seeking to collect any payments due to the National PTA” (Consent Order at (vi)):
 - a. Cashing 2021 membership dues, which included National PTA dues, submitted by a Local PTA;

Defendants’ actions are not only in complete violation and disregard of the Consent Order, but they have also caused much distress and confusion for the hundreds of volunteer-led Local PTAs throughout Maryland who are already navigating a stressful return to school in the middle of a pandemic.

We request that Defendants immediately cease: (1) communicating threats to Local PTAs regarding Local PTAs’ tax exempt status and operating status, (2) seeking monies and records from Local PTAs under the threat of revocation; and (3) continuing to operate under the MD

¹ A hearing in this case is currently set for October 6, 2021, on Plaintiff’s motion to compel compliance with the Consent Order regarding Defendants’ failure to engage in good faith discussions on this topic. As set forth in more detail in my letter to you dated July 1, 2021, Defendants have no valid basis to interfere in any manner with Local PTAs’ tax exempt status or EINs as any such action would also be a direct violation of section (i) of the Consent Order enjoining Defendants from operating under the Maryland PTA Bylaws. *See* July 1, 2021 Letter from J. Pels to W. Johnson, attached hereto as **Exhibit C**.

PTA by-laws by, among other things, holding themselves out as “MD PTA” and “Maryland Congress of Parents and Teachers” on the mdpta.org website, social media, and all other forms of communications, including but not limited to, sending meeting notices to Local PTAs, holding a virtual meeting for Local PTAs, soliciting and collecting dues for membership from Local PTAs, threatening to interfere with Local PTAs’ tax exempt status or EINs, threatening to revoke or dissolve Local PTAs, and requesting that Local PTAs who wish to disaffiliate from Maryland PTA follow Maryland PTA Bylaws’ procedures and turn over all records to Defendants. In addition, we request that Defendants immediately reimburse any Local PTAs for any dues sent to Defendants since March 2021 that were intended for, or are due to, National PTA.

We are available for a call to discuss these issues anytime today or September 10. Please advise of your availability, or for a date as soon as possible after September 10. If we do not hear from you by close of business September 10, we will be forced to seek immediate assistance from the Court, including sanctions, and request a hearing on this matter.

Very truly yours,

THE PELS LAW FIRM, L.L.C.

/s/ Jon D. Pels

Jon D. Pels, Esq.

Attachments