



**CAIR Legal Defense Fund**

453 New Jersey Ave S.E.

Washington, D.C. 20003

Tel. 202-742-6420 | Fax 202-379-3317

E-mail: [civilrights@cair.com](mailto:civilrights@cair.com) URL: [www.cair.com](http://www.cair.com)

December 7, 2022

US Department of Education, Office of Civil Rights  
The Wanamaker Building  
100 Penn Square East, Suite 515  
Philadelphia, PA 19107

**RE: Correspondence regarding Administrative Complaint to the  
Dept. of Education, Office of Civil Rights – Case No. 03231084**

To the Office of Civil Rights:

CAIR Legal Defense Fund has been retained by the [REDACTED] family in connection with the bullying and harassment, by staff and students, their children have endured at the Academy for College & Career Exploration to represent them for purposes of this complaint to the Department of Education's Office of Civil Rights. That school is a part of the Baltimore City School District.

In addition to the online submission materials, I am sending this letter to provide additional information to the Department of Education's Office for Civil Rights. First, I am attaching to this letter prior correspondence from our organization to the school district (Exhibit A) as well as the school district superintendent's response (Exhibit B). We believe that the superintendent's response, which confirms that firing of the staff member who apparently who member locked the bathroom door as [REDACTED] was attempting to flee an unprovoked violent attack that included specific efforts to remove her hijab, will be helpful to the Department of Education's investigation. *See also* [Staff Member Fired for Involvement in Attack on Muslim Student at Baltimore School.](#)

Since that incident, over the course of the last two months, the kids were tripped, pushed, have had food thrown at them, been taunted about their English language skills, and school security searched Sadaf—we believe illegally—for using the restroom made available to her so she could avoid being attacked again. School officials have also discouraged Sadaf and her siblings from communicating about additional incidents of bullying and intimidation at the school. A school official told [REDACTED] and her sister that she should feel grateful for being in the United States and not in Afghanistan and that them talking about their issues at school causes their parents pain. The message from this school official, emblematic of interactions with others, was unmistakable: the kids complaining, and not the violent bullying, were the problem most on the mind of school leadership.

All of this has led to a catastrophic breakdown in the trust between the family and the school, and after two months of unsuccessful efforts to address these issues, the family has pulled their children from the school entirely and requested a transfer.

Respectfully,

Gadeir Abbas  
Senior Litigation Attorney

**Exhibit A - October 3, 2022 Letter to Baltimore City Public Schools**



**Council on American-Islamic Relations**

**CAIR Office in Maryland**

6120 Baltimore National Pike, Suite 2D

Baltimore, MD 21228

Tele 443-251-2132 Fax 202-488-0833

E-mail: [mdoutreach@cair.com](mailto:mdoutreach@cair.com) URL [www.cair.com](http://www.cair.com)

October 3, 2022

Aquil Hamm  
Chief, Baltimore School Police  
Baltimore City Public Schools  
200 E. North Avenue  
Baltimore, MD 21202

**RE: Brutal Assault of Muslim Student**

Dear Chief Hamm,

On behalf of the Maryland Office of the Council on American-Islamic Relations (CAIR), the nation's largest Muslim civil rights and advocacy organization, I am writing to call your urgent attention to an alarming series of suspected bias motivated incidents that reportedly took place at the Academy for College and Career Exploration in Baltimore City last month. We urge you to promptly and thoroughly investigate these incidents, take full, appropriate action against those responsible including disciplinary consequences for staff and restorative action against students involved, and take steps to ensure such incidents do not happen again against any student.

According to a complaint submitted to our office, at least two female Muslim students at the school were targeted by their peers on or around September 16, 2022 in separate incidents in which their hijabs were forcibly removed from their heads.

In the first incident, on September 16 around 10 a.m. EST, a [REDACTED] Muslim teen at the school, [REDACTED] was reportedly adjusting her hijab in the girls' bathroom when she was attacked by a group of girls, several of whom looked on as at least three others allegedly punched her in the head several times, pulled off her hijab and proceeded to attempt to choke her with it. [REDACTED] attempted to escape the bathroom, but the door had been locked from the outside. School officials reportedly confirmed to the family that according to surveillance footage, a staff member locked the bathroom door.

The attack left visible bruises and swelling as later witnessed by a staff member at the school and [REDACTED] parents. CAIR learned that the pin in the scarf beneath her chin penetrated the skin of her neck, leaving injuries. After the attack, [REDACTED] opened the door, [REDACTED] left and returned to class deeply distraught and crying. At the end of the school day, as she left to go home, the same group of girls who attacked her allegedly stared at her and made intimidating hand gestures towards her.

According to [REDACTED] family, who speak very little English, the school did not report the incident to them. They learned about it from their daughter when she arrived home. [REDACTED] father, [REDACTED] emailed [REDACTED] teacher to ask why he hadn't been told about what happened. The teacher he emailed did not know what had happened, but told him that she would try to find out and get back to him.

According to the family, the school principal and a teacher visited the family at their home on Sunday, September 18. Despite assurances that [REDACTED] would be protected, [REDACTED] chose not to send her to school that Monday but allowed his other children to go. That day, one of [REDACTED]'s other daughters was approached by three

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of the same girls, who pulled her shoulder. After learning of this, [REDACTED] decided not to send any of his kids back to school for over a week out of fear for their safety.

This ordeal has left [REDACTED] with substantial physical and psychological trauma. Until Wednesday, September 28, [REDACTED] has been afraid to send his children back to school absent assurances that the school can demonstrate its ability to keep them safe. Imaging obtained during a [REDACTED] Emergency Room visit on September 27, over one week after the incident, revealed that [REDACTED] still suffered from a serious concussion. The swelling and bruising on her neck made it painful for her to swallow for several days.

[REDACTED] family has authorized CAIR to represent them and speak on their behalf. Officer [REDACTED] cc'ed on this letter, advised me during a phone call earlier today that the initial police report submitted by school police to the State's Attorney's office omitted crucial details about the nature of the attack, follow-up hospital visit, concussion diagnosis and the extent of trauma endured by [REDACTED]. **To this end, we request you to update and submit this police report with comprehensive, meticulous details about the incident so that it can be investigated and handled appropriately, and corrective action taken.** [REDACTED]

Like all articles of faith, the hijab is a constitutionally protected garment that represents a core part of the identity of girls and women who wear it. [REDACTED]

[REDACTED]. We are calling the following:

- A hate bias probe into the attack on [REDACTED] with restorative action against students involved in the assault.
- A full, transparent investigation and corrective action taken against school staff involved in the locking of the bathroom door, and who failed to inform the parents of the assault on their daughter.
- An explanation of measures taken by the school/system to ensure [REDACTED] safety and well-being.
- Compassionate, culturally appropriate counseling and support services to be made available to [REDACTED] her siblings and other impacted students for as long as they require to recover from this incident.
- System-wide anti-bullying training and cultural competency training for students and educators.
- System-wide policy changes that ensure that whenever an incident occurs compromising the safety and well-being of any child within your school system, that parents/guardians be notified by the school immediately.
- Clarification into school policies regarding the locking of any bathroom doors at any time during the school day.

Another incident reportedly occurred on or around September 19, 2022 and involved [REDACTED] neighbor, who is also a female Muslim student who wears hijab at this school. The circumstances are less clear about this incident, but also allegedly involved her headscarf being forcibly removed by other students.

Sadly, these reported attacks are not unique. CAIR National's 2022 Civil Rights Report, *Still Suspect*, documented various school-related complaints ranging from bullying, Islamophobic school curriculum, and holiday denials in 2021. A recent poll by the Institute for Social Policy and Understanding reports, "In 2022, we find that nearly half (48%) of Muslim families with school-age children reported having a child who faced religious-based bullying in the past year."

**SEE: 2022 Civil Rights Report: Still Suspect**

<https://www.cair.com/wp-content/uploads/2022/04/Still-Suspect-Report-2022.pdf>

**Bias and Bullying in Public Schools: Mitigating the Impact on Muslim and Perceived-as-Muslim Students**

[http://www.islamophobia.org/images/2019/Bullying/Bias\\_and\\_Bullying\\_White\\_Paper.pdf](http://www.islamophobia.org/images/2019/Bullying/Bias_and_Bullying_White_Paper.pdf)

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CAIR is available to assist and provide trainings and resources on issues concerning the rights and well-being of students within your school system. We thank you for your prompt attention to these concerns, and look forward to your reply.

Sincerely,



Zainab Chaudry, Pharm.D.  
Director, CAIR Office in Maryland  
Council on American-Islamic Relations

P.S. October has officially been designated as 'Statewide Bullying Prevention Month' by Governor Hogan. We encourage you to take advantage of this month to offer education and training on this potentially devastating issue to help create a safer learning environment for all of our children within your school system. Please consider CAIR a resource and ally in this important cause, and reach out to me directly if we can help in any way.

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**Exhibit B - October 5, 2022 Letter from Superintendent Santelises**

# BALTIMORE CITY PUBLIC SCHOOLS

**Brandon M. Scott**  
Mayor, City of Baltimore

**Jhonneta A. Richardson**  
Chair, Baltimore City Board  
of School Commissioners

**Dr. Sonja Brookins Santelises**  
Chief Executive Officer

October 5, 2022

Dr. Mohammed Choudhury  
State Superintendent of Schools  
Maryland Department of Education  
Office of the State Superintendent  
Maryland State Education Building  
200 W. Baltimore Street  
Baltimore, MD 21201

Re: Incidents at The Academy for College and Career Exploration

Dear Dr. Choudhury,

I am in receipt of the September 29, 2022 letter sent to you by Dr. Zainab Chaudry, Director, Council on American-Islamic Relations (“CAIR”), who is copied on this letter. City Schools shares CAIR’s commitment to promoting equity and ensuring that no student should ever attend our schools and not feel safe, respected, and valued.

I am writing to share with you the significant steps that Baltimore City Public Schools (“City Schools”) has already taken to thoroughly investigate and address the concerns raised in CAIR’s letter.

On September 16, 2022, a student informed her teacher, who in turn informed administrators at The Academy for College and Career Exploration (“ACCE”), that she experienced bullying and harassment when her hair and hijab were pulled by one or more other students. The ACCE administration immediately launched an investigation pursuant to [Baltimore City Board of School Commissioners \(“Board”\) Policy JICK](#) (Bullying, Harassment, or Intimidation of Students), [Board Policy JBA](#) (Nondiscrimination – Students), as well as the accompanying administrative regulations. Baltimore School Police also were notified, responded to the school, and followed up with the family. As a result of the investigation, City Schools imposed disciplinary consequences consistent with [Board Policy JKA](#) (Behavioral Interventions and Student Discipline) and the Student Code of Conduct. In addition, the temporary staff member will no longer be employed by City Schools.

ACCE administrators also investigated a second incident that occurred on September 20, 2022, which is also referenced in the letter from CAIR. As a result of the investigation, City Schools imposed disciplinary consequences consistent with Board Policy JKA (Behavioral Interventions and Student Discipline) and the Student Code of Conduct.

Throughout the investigation of these incidents, school administrators followed the protocols set out in [Board Policy JICK](#) (Bullying, Harassment, or Intimidation of Students), [Board Policy JBA](#) (Nondiscrimination – Students), [Board Policy JKA](#) (Behavioral Interventions and Student

Discipline), and their associated administrative regulations. In addition, ACCE staff members and other City Schools staff communicated with the students and their family members, including written notification letters of the results of the investigations (translated into the family's preferred languages for communication), as well as a home visit to the family of the student victim in the September 16 incident. The families of the student victims in the September 16th and September 20th incidents have been provided supports and safety plans, and they have been notified of their appeal rights if they are dissatisfied with the outcomes of the investigations. City Schools' ombudsperson has also engaged and offered support.

There is some additional information in CAIR's letter that has not been previously reported to City Schools, which will be investigating and addressed promptly.

Finally, City Schools has been treating these incidents with the utmost seriousness since they were first reported, and are using a variety of approaches to address the serious concerns raised in the letter from CAIR. Since the first incident, ACCE Principal Nick D'Ambrosio has facilitated schoolwide student and faculty community meetings to discuss religious/cultural attire and the serious consequences that will result from interfering with an individual's cultural/religious attire. A restorative circle was also held with the accused students from the September 16 incident. Several faculty members are also designing lesson plans for students in the middle and high school to learn about each other's identities and cultural values. And the School Equity Action Team (SEAT) will continue to meet with their Equity Specialist to co-create an equity action plan that addresses racial inequity in their school and elevates cultural awareness and inclusivity programming. As of October 3, 2022, all of the student victims are back in school safely.

City Schools also would welcome a collaborative engagement with CAIR around the issues raised in its letter. Please contact me if you have any further questions or concerns.

Sincerely,

Sonja B. Santelises

Cc: Dr. Zainab Chaudry, Director, CAIR Office in Maryland  
Alison Perkins-Cohen  
Tracey Durant  
Joshua Civin  
John Davis  
Tina Hike-Hubbard