John and Katharine Blevins 1525 Overlook Dr. Saint Leonard, MD 20685 410-541-9467 johnsblevins@gmail.com ktleigh79@gmail.com ccpseducation101@gmail.com

December 25, 2019

Mr. Nicholas Ferrante 141 Main St., Suite 200 Prince Frederick, Maryland 20678

Dear Mr. Ferrante:

We received your certified cease and desist letter and copy in our mailbox on December 23rd. We hope you will receive the return receipt in the mail, unlike how we did not receive any of the ten return receipts for the complaint we sent to the CCPS central office and which were received on April 16, 2018. As we have already stated in other communications, we are telling the truth and will disregard any cease and desist communications, but that does not mean we will not address them. This is the first we have received in our so far twenty-month-long efforts, and whether or not it is the last, we will not be intimidated. Does it strike you as odd we have not received any prior cease and desist communications, given what we have been alleging and insinuating for so long? We regard your letter as one more of Calvert County Public Schools Superintendent Daniel D. Curry's pathetic efforts to silence us to conceal his and others' abuses, and wish to apprise you of some of the things we have experienced and know. We welcome any opportunities for transparency. Daniel D. Curry is a liar and an abuser, and as our first suit for violations of the MD Public Information Act proceeds, he is growing more afraid. Daniel D. Curry lies to everyone and makes constant efforts to isolate and compartmentalize people to abuse and protect himself from exposure. We already have reason to suspect he has been lying to attorneys at PK Law regarding his and others' abuses, and if you believe we have misrepresented anything of import in correspondence or online you are mistaken. For example, we will be meeting with PK Law in January to review emails they provided. Many were entirely missing, aside from so many which were missing addresses and even full bodies. We strongly suspect CCPS provided them incomplete records, and that PK Law was at least somewhat unwitting when they represented them as complete to our attorney. John is able to prove this and, if need be, two of his expert colleagues can back up his analyses. However, John's expertise alone is more than sufficient.

We can understand how at first glance, and/or for any person unfamiliar with what is going on in CCPS or our family's situation, our allegations might appear scurrilous and spurious. They are not. <u>www.calvertedudocs.com</u> is not a sophisticated site by any means, but its content is true and valid. The website is simplistic for different reasons: we are not web designers and if we put much effort into design it would detract from other efforts, it has been an effective means to disseminate honest information *and* we are convinced it has helped get under CCPS liars' and abusers' skins to force the truth. Our efforts are to force exposure of abuse in CCPS, to ensure victims receive the acknowledgement and help they need and for abusers to be held accountable. From there we hope to

hear about CCPS returning to what it used to be. We have financial motives, as we are expending resources and taking on significant risk, but our financial motives are entirely secondary. After we sent in our complaint in April of 2018 Daniel D. Curry ordered further abuse of our daughter, and our sons were not safe to remain in the system. He is a vicious and retaliatory monster. Yours is only one more in a series of attempts at intimidation and suppression, and we wonder if the Board of Education is even aware you have been retained, as your "client assesses the damages." Any damages are of CCPS' own making, and we cannot be blamed for exposing what *they* have done. That said, and despite what has happened and what we know, we still believe the majority of people employed by CCPS are caring, conscientious professionals who hate what is happening, and who wish to see the system turned around as much as anyone.

We received our first communication from Daniel D. Curry via email on May 1, 2018. In it, he dismissed our requests for help and our daughter Sarah's abuse, including how she was set up and terrorized at the end of the last class period of the day on April 30th, in an attempt to force a false confession. This was a plot to hold her in Lusby after school, so Sarah, John and I would be unable to attend a meeting with CCPS administrators in the conference room at Calvert High in Prince Frederick at 4:30pm. Sarah did not break and so they could not hold her after school. Daniel D. Curry knew we were complaining about circumstances resulting from pedophilia, did not want us to make it to that meeting, and was content to hurt an innocent child and stand up the administrators/investigators he assigned to meet with us. After the setup failed and Sarah came home sobbing on the bus, I received a call at 4:06pm on my phone from a *blocked* phone number, from long-term substitute Spanish teacher Ashley Adams. I announced the call was being recorded and the Board received the recording via email on May 1. We made it to the 4:30 meeting. We do not believe Ashley Adams conceived of placing the call, and we believe former Southern Middle Vice Principal Travis Mister, and maybe former Principal Mandy Blackmon helped set up the call, with Daniel D. Curry's knowledge and influence. That was Sarah's last day in CCPS, and we removed our sons at the end of the year. They are now thriving in private school, are well-supported and receiving excellent educations in a disciplined and respectful environment. We wish the same for all kids still in CCPS, and it is a shame and to the detriment of the entire community that is not the case.

On April 30th, at our 4:30pm meeting, we turned in our first PIA request, for email communications pertaining to our daughter and family. We also turned in a letter stating our intentions moving forward, which we drafted before the setup and phone call (on <u>www.calvertedudocs.com</u>). It was our belief that if we hit CCPS as hard as possible, they would see how serious we were and it would be sufficient motivation to quickly address the problems at Southern Middle. Back then we could not conceive of how much Daniel D. Curry, his coterie of abusers, and so many other abusers and enablers in CCPS had to hide. Despite John's arguments with the IT Director disproving his claims about search methods and count sheet errors, thousands of emails which could not have been considered privileged were missing, three lines were carefully removed from the count sheet, and we paid over \$2,000. Also, no emails should have been removed, as we were informed the emails would be subject to redaction only. We received them in a mislabeled and piecemeal fashion, but John was able to analyze the metadata, and his colleagues confirmed his results.

On May 1st, my phone started blowing up in the mornings with an inordinate number of phone calls from Southern Middle School. Travis Mister handled the automated phone calls and we do not know if anyone else participated in those excessive calls. They continued every weekday morning through May

18th (with the exception of May 10th – we attended that Board meeting and we know our presence was announced prior to the meeting, maybe that had something to do with it). Neither John's phone nor our email, home phone or text applications had this same problem. Also, on May 1st, we began emailing the Board on a regular basis, apprising them of everything we could and with study plans to assist Sarah with her work, as best possible from home, to prove we were doing everything we could to help Sarah with her education, while ensuring her safety. We sent fourteen of them: on May 1st, May 3rd, May 4th, May 7th, May 8th, May 9th, May 11th, May 15th, May 16th, May 17th, May 18th, May 21st, May 22nd and May 25th. We never heard from any of the Board members or Executive Staff to whom we sent these emails, and to whom we sent our initial complaint. Since then we have sent myriad other emails to CCPS, and insisted on full documentation and transparency as much as possible. Other than one occasion when I ran into Dawn Balinski at the Rite Aid, pointed out my daughter, Sarah Blevins, told Ms. Balinski she doesn't respond to emails (she says at Board meetings she does), and sputtered at her that her representation was dismal and we have no idea how she lives with herself, there has been no other contact, save for email; and, during PIA records pickups, Sarah's laptop return, Sarah's withdrawal from CCPS and Board Meetings all at the Central Office. Ms. Balinski's justification for not responding to our emails? That we had taken action against CCPS, nearly a year after our initial complaint was received.

On May 8th we received another email from Daniel D. Curry, where he continued to dismiss Sarah's abuse and telling us to return her to school. If you read our initial complaint on the website, where we warned that we feared retaliation against our daughter, we hope you would agree Daniel D. Curry should have been far more inclined to take our situation seriously, and be anything but dismissive.

On May 10th, at the beginning of the Board meeting, we turned in a PIA request for financial records from CCPS. Many of the requested items consisted of reports to be run from their financial software, and would have taken hardly any time to produce, yet Daniel Curry emailed us saying CCPS did not have the reports or other documents and our concerns were irrelevant. The cost estimate and receipt both stated all documents had to be retrieved from a "remote storage facility;" mostly, if not entirely, in violation of CCPS Retention Policy. We paid over \$3,000 for these records, and are missing many; yet, we were provided compromising financial and personal information for numerous CCPS employees.

On May 15th we received a retention warning letter from dishonest and abusive *former* SMS Principal Mandy Blackmon.

On May 21st we received a phone call from a CCPS Pupil Personnel Worker and she sent out a charging and retention warning letter the same day.

On May 22nd we received an email from Daniel D. Curry threatening truancy action. He also told us if we wanted to meet with him we should contact his assistant; however, with what we had already seen and experienced we wanted fully documented communication wherever possible and did not contact her to request a meeting.

On May 24th Daniel Curry responded to an inquiry from reporter Andrew Cephas, formerly of the Calvert Recorder, and threatened us with truancy charges, which was first published on the Recorder site on May 25th, and later in print in a front-page story. Given how some kids in CCPS miss significant portions of school years due to serial unexcused absences, do you realize how preposterous it is that we

might have faced charges for protecting our daughter? We were afraid, as we had just learned of one other family who was charged for protecting their daughter. When those parents got to court the judge was disgusted and threw out the charges. John was recertifying his clearance during this time, and the investigators asked questions about the threat of charges.

On June 4th we informed Curry, the Board and Executive Staff we would be withdrawing Sarah from CCPS. We made the decision to remove our sons, Michael and Andrew, as well. We were still worried about the prospect of charges, and had applied for a Home Hospital designation for Sarah for the remainder of the year. CCPS refused our Home Hospital request on the basis that a licensed psychiatrist or psychologist had not signed the papers; however, the MD counselor who signed them assured us CCPS accepted others he signed in the past. Daniel D. Curry said that was not true.

When we visited the Central Office for records pickups and to withdraw Sarah, we had some difficulty signing in and out and the system was manipulated to try to make things difficult for us. We photographed and made note of discrepancies from one instance to the next.

This past summer a CCPS Transit Connect van parked in front of our home. The driver was watching our home and the van moved as I approached our dining room windows. Daniel D. Curry has a habit of checking out those vans, even though CCPS provides him an all-expenses-paid vehicle. We live on a loop in an out-of-the-way area; it is by no means a thoroughfare.

On August 8th, 2019 our family went to speak at a Board meeting. Unlike another occasion where the donation of speaking time was permitted, this time it was not. The three speakers in our family were reordered differently than the order in which we signed up, which according to Board President Dawn Balinski was done to create speaker "diversity." During Public Comment she ordered Sarah to stop speaking because she used Daniel D. Curry's *name*. Also, there was no audio on the CCPS recording for our speeches, but there was for the other speaker (documented on our website with video our son, Michael, took). There was a total of four speakers, and the other's echoed so many of our concerns about the schools.

On October 17th, 2019 we sent a letter to the BoE and CCPS Executive Staff where we spelled out some of the motives for how Daniel D. Curry and others have been running CCPS, and to which we had been alluding for some time. We posted it on <u>www.calvertedudocs.com</u>. That letter terrified him, and the next day CCPS' attorneys informed our attorney that the Board had referred us to law enforcement. When reminded that our efforts are in the public interest and we have First Amendment rights, their lawyers tried to walk back that claim and suggested we meet with Sheriff Evans and Daniel D. Curry. Apparently, as of then, there were no documents regarding our referral to law enforcement, if a referral was actually made. When we sent out and posted two other letters on October 23rd, copying Sheriff Evans, he promptly emailed us and we do not believe we are being investigated for the "harassment" CCPS' attorneys claimed. Sarah spoke at the meeting on October 24th, and after all she has been through was strong, clear and stood up for herself. She told the truth.

On November 20th we sent a letter asking for Daniel D. Curry to be removed from consideration for the National Superintendent of the Year award. If you watch the public comments at the last several Board meetings, you will see we are far from alone in our complaints about how he has run the system into the ground. That was the first letter on which we copied the County Commission, which provides a

significant portion of CCPS' funding, but receives little information beyond what Daniel D. Curry gives them, just as was the case with Jack Smith before him.

On December 3rd we sent and posted another letter. I was mistaken when I stated all of the emails we sent to CCPS addresses bounced back - one did not. Mrs. Claggett emailed me that she had indeed received the email, and when I went back and looked saw hers was the lone exception. The email address we have and use for her has a different DNS suffix than all others. It is clear Daniel D. Curry was again trying to control information. Also, during the sham fifteen-minute June 24th meeting, which preceded the improperly advertised Closed Door meeting for the Superintendent's evaluation, I wrote that three employee transfers/promotions were confirmed. Actually, there were five. While we have made small errors of that nature throughout this process, the substance of what we are saying is true, and there are no mitigating factors for how bad this situation is. There is documentation on the website for how the advertisement for that meeting was manipulated and all efforts we made to try to get CCPS to reschedule and properly advertise the meeting. It was first advertised the same day and immediately after the Certificate for Discovery for our PIA lawsuit was delivered. Also, at that meeting, the Board voted to apply for a grant for supplemental Kirwan Commission salary funding. There was no need to hold a vote, and all districts in Maryland received the grant to supplement teacher salaries for the 2019-2020 school year. Contrary to Daniel D. Curry's statement that "it will be a good year for teachers," they are subject to more violence, chaos and disrespect than ever. That year's worth of extra money will go for little more than to repair and replace broken classroom items, and for take-out dinners, medical copays and the like. None of the five people transferred/promoted at that meeting were mentioned in Personnel reports attached to Board agendas. Travis Mister's promotion and subsequent transfers were never mentioned in those reports, either; additionally, no votes were ever taken, nor announcements made, as Daniel D. Curry promoted him to Vice Principal at Southern Middle School, then transferred him for one year to Plum Point Middle and then to the CTA at Calvert High. Why has Daniel D. Curry always been so protective of Travis Mister? Is there a pedophile ring in CCPS?

We are sure that the timing of this cease and desist letter was intended to put a damper on our Christmas. It hasn't. We do, however, wish the unmerriest of Christmases and unhappiest of holidays to Daniel D. Curry and other abusers in CCPS. Here are a few of the things that happened to us and which our lawsuits will expose:

- Our daughter, Sarah Blevins, was the subject of a lengthy campaign of gossip and ostracism at Southern Middle by numerous educators, who used students to further hurt her. They knew this could drive her to a breakdown or suicide, and they were motivated because we told them we supported her in documenting the chaos and abuse at the school (read the initial complaint). She lost many friends, misses others, but nonetheless misses all of them, although she has made many new ones at her new school.
- Our sons faced retaliation because it was no longer possible to get to Sarah and so we removed Michael and Andrew from CCPS. Our sons are happy at their new school and have made new friends, but miss their old friends, too.
- The whole situation was and is very jarring and upsetting for our family. We could never have imagined this, prior to going through it. Everyone already has enough going on; our family was and is no exception. How could this be happening in plain sight? A large part of the reason is because the Board of Education has the power to hire and fire the Superintendent, but three of them have been lazy, malicious, dishonest, arrogant, and complicit in their misuse and abuse of power. State laws needs to change and the MD

Department of Education should return phone calls. They should not laugh at, mock and dismiss people when they can be reached. They should do their jobs.

- Numerous educators have spread horrible, patently false rumors about John and me in the community. We know for a fact former Principal Mandy Blackmon and Counselor Tammy Frawley were actually *calling* parents from Southern Middle and telling them these things, which was interesting given how hard it normally was to get them to return calls for issues pertaining to facilitating student wellbeing and educator/parental knowledge. We are not greedy, grifters, crazy, mentally ill, crazy, insane, liars nor abusers. Funny thing is, none of them even know us. That said, we know they are not in any way representative of the majority of caring educators in CCPS, and all the way along have tried to create an umbrella of protection and documentation for anyone we suspect might deserve it.
- People around the community have bought into these rumors, and sometimes expanded on them. We have all been impacted, first and foremost including our kids. I am not a thief (in fact, we were generous).

It is astonishing to us that Daniel D. Curry will run roughshod over so many good educators in the system, and even hire lawyers to beat them down, while similarly wasting taxpayer money to protect himself and other abusive educators. He does not care about the people in the system he runs, or our community, and is severely lacking in integrity. Aside from what our daughter and family have endured, and which alone would be sufficient to pursue, we care for everyone else in our community who has been or could be hurt, and that also is sufficient motivation. It is only a little more work to roll the latter into a combined effort, and which we believe will have a painful, but significantly beneficial long-term impact to CCPS and the community. Daniel D. Curry, and the majority of the Board do not want us to succeed, because it would reveal a horror show of abuse, dishonesty, selfishness, negligence and mismanagement. It is not because they *care;* it is because they care about themselves.

We feel horribly for the family and friends of the abusers who will be exposed. They do not deserve this, and we wonder how many might in any way blame themselves. There will be so many impacted, including children. Some of them will recognize past signs and wonder how they could have been so ignorant and unaware. They will have to deal with the consequences of their loved ones' actions, and unfortunately, might feel them more harshly than they should. These are people who deserve their friends', neighbors', loved ones' and community's support. We mean it.

Daniel D. Curry will be making his budget presentation at Calvert High on January 23rd. We have heard the meeting will not be recorded and posted, but hope that is not true. If it will not be, we will be there to record it and will place the video on <u>www.calvertedudocs.com</u>. Curry's budget presentation from last year, in late February, was not recorded, either.

We are not sure what you or the State's Attorney's Office might be able to do to assist Daniel D. Curry and the other liars and abusers in CCPS in protecting themselves from the truth of what they have done. From the beginning of our efforts we have operated with and encouraged transparency wherever possible. As you have copied the State's Attorney's Office on your cease and desist letter, we will copy them too, and mail a certified hardcopy to Mr. Rappaport the day after Christmas. We are scared for how long it will take our suits to produce the information we know at a minimum exists, and the trial for our first PIA suit is not slated until September 2020. In the meantime, how much more intimidation might we continue to face, and will any of it be more troubling than this? A lot of people already need acknowledgment and help, and we are scared for how many more will need help before our suits are complete. We would very much like to meet with the State's Attorney's office to provide them information; however, we are having to fight for it and don't yet have a lot to present. CCPS, among other things, has the ability to keep law enforcement out of the schools for so many things, and caring educators face intimidation and retaliation if they do try to report crimes and abuse committed in CCPS. If you represent CCPS in taking legal action against us to try hide their lies and abuse it will be a way to facilitate the help and transparency this community and system so desperately needs, and we welcome any information which might be uncovered through any means, which we believe will shed light on a plethora of abuses that occur every day in CCPS. It won't, however, work out very well for the liars and abusers in CCPS.

Eagerly and sincerely,

John Blevins

Katharine Blevins

Cc: Mr. Andrew Rappaport, Calvert County State's Attorney

Calvert County State's Attorney's Office

Mr. Cary Hansel, Hansel Law

Mr. Thomas Hutchins, President, Calvert County Commission

Mr. Earl Hance, Calvert County Commissioner

Mr. Mike Hart, Calvert County Commissioner

Mr. Kelly McConkey, Calvert County Commissioner, and <u>not complicit</u> former CCPS Board member

Mr. Steve Weems, Calvert County Commissioner

Ms. Inez Claggett, not complicit BoE member

Ms. Pamela Cousins, not complicit BoE member

Ms. Dawn Balinski, complicit BoE member

Ms. Tracy McGuire, complicit BoE member

Mr. William Phalen, complicit BoE member

Dr. Susan Johnson, Director of Secondary School Improvement

Ms. Kim Roof, Director of Student Services

Ms. Karen Maxey, Assistant to the Board

Ms. Diane Workman, Assistant Superintendent

Mr. Anthony Navarro, Executive Director of Administration

Soon-to-be former, predatory and sadistic Superintendent Daniel D. Curry

Enclosure

Ferrante, Dill \mathcal{E} Hisle, LLC

Attorneys at Law

Nicholas Ferrante, Esquire <u>nferrante@ferrantedill.com</u> Licensed to Practice in MD and DC

December 19, 2019

VIA CERTIFIED AND FIRST CLASS MAIL

John and Katharine Blevins 1525 Overlook Drive Saint Leonard, Maryland 20685

Re: Calvert County Public Schools

Dear Mr. and Mrs. Blevins:

Our firm has been retained by Calvert County Public Schools ("CCPS") to address misrepresentations you have made and publicized regarding CCPS employees in correspondence and online.

As our client assesses the damages caused by your actions, you are hereby directed to immediately and permanently cease and desist from making any further unlawful, unsubstantiated, false, misleading and/or defamatory statements about any CCPS personnel. Failure to comply will result in further legal action to achieve these ends.

Very Truly Yours,

Nicholas J. Ferrante, Esq.

NJF/ces

cc: Dr. Daniel D. Curry Calvert County State's Attorney's Office