

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, MARYLAND

NATIONAL CONGRESS OF PARENTS
AND TEACHERS, INC.,

Plaintiff,

vs.

LATONJA CARRERA, *et. al*,

Defendants.

Case No.: 486117-V

MOTION FOR CONTEMPT AND ORDER TO SHOW CAUSE

COMES NOW, Plaintiff, National Congress of Parents and Teachers (“National PTA”) on behalf of itself, and on behalf of local PTAs and PTSAs (“Local PTAs”) in the State of Maryland, including 196 Local PTAs in Montgomery County, who are members of the National PTA, and hereby submits its Motion for Contempt and Order to Show Cause¹ and states as follows:

INTRODUCTION

Defendants LaTonja Carrera (“Carrera”), Board of Directors of Maryland Congress of Parents and Teachers, Inc. (“Board of Directors of Maryland PTA”), and the Alliance for Maryland Parents, Teachers and Students (“Alliance”) (together, “Defendants”) agreed to the terms of a Consent Order that was signed on June 15, 2021 and entered in the docket on June 21, 2021 (“Consent Order”), enjoining them from, among other things, taking any action “operating under the Maryland PTA bylaws.” *See* Consent Order at D.E. # 15.²

¹ This motion is not seeking incarceration under Maryland Rule 15-206.

² The Maryland PTA Bylaws referenced in the Consent Order were attached as Exhibit A-25 to Plaintiff’s Complaint (D.E. #1). For ease of reference, a copy is attached hereto as **Exhibit 1**.

Since the entry of the Consent Order, however, Defendants have failed and refused to comply with several provisions of the Consent Order, necessitating court intervention.

Prior to entry of the Consent Order in June 2021, Defendant Carrera purported to be acting as the President of Alliance for Maryland Parents, Teachers and Students (“Alliance”), also a named defendant in this case, and advertising was branded as such. *See* Alliance Website, as of July 22, 2021, attached hereto as **Exhibit 2**. Defendants created the Alliance after the entity known as Maryland Congress of Parents and Teachers, Inc. had its charter with National PTA revoked in March 2021 for various acts of misconduct by Defendants. *See* Complaint at ¶¶26, 37-38, D.E. #1.

After entry of the Consent Order, which, among other things, prohibits Defendants from taking any action operating under the Maryland PTA Bylaws and required Defendants to enter into good faith discussions to attempt to resolve the tax exempt status issue of Local PTAs, Defendants also claim to be, and are acting as, Maryland Congress of Parents and Teachers, Inc. -- the “constituent association of” the National PTA *identified in the Maryland PTA Bylaws* (*see Exhibit 1*, Article I). *See, e.g.*, a copy of the website www.mdpta.org as of September 30, 2021, attached hereto as **Exhibit 3**. As shown below, Defendants claiming to be and acting as both Alliance and Maryland Congress of Parents and Teachers, Inc. have engaged in numerous violations of the Consent Order.

FACTS

I. The Consent Order

1. On June 14, 2021, Plaintiff filed a “Motion for Temporary Restraining Order and Preliminary Injunction” (“TRO Motion”) against Defendants. *See* D.E. # 4 and #5.

2. Plaintiff filed the TRO Motion in response to Defendants issuing a deadline of June 15, 2021, for all Local PTAs to either join the entity, then advertised as “Alliance for Maryland Parents and Teachers” (“Alliance”), or face the loss of their tax exempt status, EIN, and use of their name, and be forced to turn over their bank accounts and assets to Alliance. *See* Alliance Website, dated July 22, 2021, **Exhibit 2**.

3. The parties appeared, along with their respective counsel, at an emergency hearing on the TRO Motion on June 15, 2021.

4. At the start of the hearing, the parties were directed to engage in discussions without the Court present to attempt to resolve the issues set forth in Plaintiff’s TRO Motion. During the parties’ discussions, Defendants consented to relief sought in Plaintiff’s TRO Motion.

5. Specifically, by way of Consent Order, Defendants agreed that they “shall be enjoined from taking any action from:

- (i) operating under the Maryland PTA bylaws (*See* Ex. A-25);
- (ii) seizing or attempting to seize, freezing or attempting to freeze, or otherwise taking control or attempting to take control of Local PTAs’ funds and/or bank account without Local PTAs’ consent;
- (iii) withdrawing charters of Local PTAs;
- (iv) seeking to present, or otherwise acting to prevent, Local PTAs from using their current names without the Local PTAs’ consent;
- (v) for a period of thirty (30) days, seeking, or otherwise causing, the Internal Revenue Service (“IRS”) to revoke Local PTAs’ 501(c)(3) status or EINs without Local PTAs’ consent, with counsel for Parties continuing in communications in good faith to attempt to resolve the issue; and
- (vi) collecting or seeking to collect any payments due to the National PTA.”

See Consent Order at D.E. # 15.

6. Based on Defendants’ agreement to the terms of the Consent Order enjoining them from taking any actions set forth above, and agreeing to the provision requiring them to engage in

good faith discussions relating to the 501(c)(3) tax exempt status issues, Plaintiff agreed not to proceed with a hearing on the merits of its TRO Motion.

7. The parties' agreement was formalized in the Consent Order which was submitted to the Court and signed by the Honorable David Lease on June 15, 2021.³ *See* D.E. #14.

II. Defendants Violated the Consent Order By Refusing to Engage in *Any* Discussions, Much Less The Good Faith Discussions Required Under Section (v) of the Consent Order Relating to the 501(c)(3) Tax Exempt Status Issues

8. Almost immediately after agreeing to the terms of the Consent Order, Defendants began violating them. During the thirty days following signing of the Consent Order, Defendants failed to comply with Section (v) requiring the parties to engage in good faith discussions to attempt to resolve the 501(c)(3) tax exempt status issues of the Local PTAs, ignoring Plaintiff's counsel's attempts to engage in such discussions. *See* D.E. #19 at Ex. 2, Att. A and B.

9. On July 15, 2021, Plaintiff filed its Motion to Compel Compliance with Consent Order and Extension of Time Period for Section (v) of Consent Order ("Compliance Motion"). Plaintiff's Compliance Motion seeks to have this Court compel Defendants to comply with the Consent Order requirement to engage in good faith discussions to attempt to resolve the 501(c)(3) tax exempt status issues. The Compliance Motion sets forth the critical need, as described in detail in the TRO Motion, for the Local PTAs to maintain the status quo with regard to their 501(c)(3) tax exempt status. The Compliance Motion further seeks an extension of the 30-day time period set forth in the Consent Order prohibiting Defendants from taking action relating to Local PTAs 501(c)(3) tax exempt status for an additional 90-days, or until such time as the Court is satisfied that Defendants have engaged in the required good-faith discussions. *See* D.E. #19. A hearing on the Compliance Motion is scheduled for October 6, 2021. *See* D.E. # 24.

³ The Consent Order was entered by the Court on June 21, 2021 at D.E. # 15.

10. In their Opposition to Plaintiff's Compliance Motion, Defendants did not dispute that the Consent Order required them to engage in good faith discussions to attempt to resolve the 501(c)(3) tax exempt status issues. Nor did Defendants dispute that they had not responded to Plaintiff's counsel letter and e-mail seeking to engage them in the required good faith discussions. Rather, Defendants asserted that there was "no immediate threat" and "no imminent threat" to Local PTAs' 501(c)(3) tax exempt status. *See* D.E. #22 at 1 and 5. While Plaintiff's Compliance Motion has been pending, however, Defendants have continued to threaten Local PTAs with the loss of their 501(c)(3) tax exempt status, and have taken other actions in violation of the Consent Order. *See* ¶¶11-17, *infra*.

III. Defendants Continue to Operate Under the Maryland PTA Bylaws In Violation of the Consent Order

11. As noted above, Section (i) of the Consent Order enjoins Defendants from taking any action "operating under the Maryland PTA bylaws." However, Defendants' actions since entry of the Consent Order demonstrate that Defendants not only flagrantly continue to take actions operating under the Maryland PTA Bylaws, they in fact claim to be Maryland Congress of Parents and Teachers Inc. -- the entity that is the "constituent association" of the National PTA *identified in the Maryland PTA Bylaws*. *See* **Exhibit 1**, Article I.

12. Significantly, subsequent to entry of the Consent Order, Defendants continued to hold themselves out to the public as, and use and operate under the name, "Maryland Congress of Parents and Teachers, Inc." and have taken actions purporting to actively promote the mission of "Maryland Congress of Parents and Teachers, Inc." set forth in Article II of the Maryland PTA Bylaws. *Id.* at Article II. Defendants have done this while also interchangeably claiming to be and acting as Alliance. Specifically:

a. On July 22, 2021, Defendants sent an email to Local PTAs inviting them to a “Virtual Launch” of “The Alliance for Maryland Parents, Teachers and Students, Inc.” (“Alliance”), using as their address at the bottom of the email “Maryland Congress of Parents and Teachers Inc.” and “5 Central Avenue, Glen Burnie, MD,” the address of the building owned by Maryland Congress of Parents and Teachers, Inc. *See Exhibit 4.*

b. On September 6, 2021, Defendant Carrera sent an eleven-page letter to the Local PTAs (the “September 6 Letter”). *See* Attachment B to the Affidavit of Wayne R. Bauman (“Bauman Aff.”), attached hereto as **Exhibit 5.**⁴ In the September 6 Letter, Defendant Carrera represents that she is writing to the Local PTAs in her role as “President of Maryland Congress of Parents and Teachers Inc.” and on behalf of the “current Board members.” *Id.* at 1.

c. The September 6 Letter purports to set forth Defendants’ position on “(1) What the disaffiliation with National PTA means; (2) How does this affect your Chapter; (3) **MCPTS, Inc.’s Motto, Mission;** (4) Federal, State **and Maryland Congress of Parents and Teachers Inc.’ requirements for Chapters** (5) **Membership.**” *Id.* (emphasis added).

d. In the September 6 Letter, Defendant Carrera states that “[National PTA’s disaffiliation] doesn’t affect your Chapters at all. Maryland Congress of Parents and Teachers Inc. created or established the Chapters within the State of Maryland to facilitate the administration of the affairs of Maryland Congress of Parents and Teachers Inc. and to carry out its programs and visions set in place. Maryland Congress of Parents and Teachers Inc. also formatted the actual template for the Bylaws and Articles of Incorporations of all subordinate chapters.” *Id.* at 2.

⁴ National PTA received a copy of the September 6 Letter from several Local PTAs. *See* Bauman Aff. at ¶4. Local PTAs expressed confusion and concern to National PTA about the threats contained in the September 6 Letter. *Id.* at ¶7. Defendants also posted the September 6 Letter on the website for “Maryland Congress of Parents and Teachers, Inc.” at www.mppta.org/chapter-information/. *See Exhibit 3.*

e. In addition, since entry of the Consent Order and continuing, Defendants have held themselves out as Maryland Congress of Parents and Teachers, Inc. on various social media platforms, including Twitter, Facebook and Instagram, using the name “Maryland Congress of Parents and Teachers, Inc.” and its logo with its 1915 charter date. *See Exhibit 6; see also* September 6 Letter (**Ex. 5**, Att. A) at 1.

f. Since entry of the Consent Order, and continuing, Defendants have sent correspondence to Local PTAs in which Defendants represent that they are sending the communications as, or on behalf of, Maryland Congress of Parents and Teachers, Inc. *See, e.g.,* July 22 Email (**Ex. 4**), *see also* September 6 Letter (**Ex. 5**, Att. A) at 1. And at the same time, Defendant Carrera has represented to be acting as, or on behalf of, Alliance. *See* Paragraph 13. a., *infra*.

13. Defendants have also continued to engage in other actions operating under the Maryland PTA Bylaws in violation of the Consent Order. For example, Defendants have continued to charter Local PTAs under the authority provided in the Maryland PTA Bylaws to “create or establish constituent associations within its area to facilitate the administration of the affairs of Maryland PTA and for carrying out its programs, and may prescribe the form and content of the bylaws or other articles of association of such constituent associations.” **Exhibit 1** at Article IV, Section 3. Further, Defendants have notified Local PTAs that they must remain compliant with Maryland PTA Bylaws, or face threatened consequences to be taken against them by Defendants pursuant to the Maryland PTA Bylaws. Specifically:

a. Responding to an August 12, 2021 e-mail from an officer for a new PTSA entity, Defendant Carrera took steps to charter the new PTSA by providing to its officer an EIN and informing the officer that Defendant Carrera would forward to the Local PTSA a copy of the

Group Exemption letter once it is sent to the IRS notifying them that the new PTSA was covered by the 501(c)(3) group tax exemption held by the Maryland Congress of Parents and Teachers, Inc.⁵ See Affidavit of Briana Sanders, attached hereto as **EXHIBIT 7**, at ¶8.

b. In the September 6 Letter Defendant Carrera sent to Local PTAs (*see* Paragraph 12.b., *supra*), Defendant Carrera threatened that the Maryland Congress of Parents and Teachers, Inc. would take action against Local PTAs for failure to be in compliance with Maryland PTA Bylaws, for example, requiring payment of dues and providing information required under the Maryland PTA Bylaws. Specifically, Defendant Carrera threatened Local PTAs that “any Chapter of Maryland Congress of Parents and Teachers Inc. that ***has not paid their current dues and/or become compliant*** ... will be reported . . . as not being part of the Maryland Congress of Parents and Teachers 501(c)3 Group Exemption as stated with the IRS.” **Exhibit 5**, Att. A at 7 (emphasis added).

14. Under the guise of the authority of the Maryland PTA Bylaws, Defendants have continued to threaten that failure of the Local PTAs to comply with requirements set forth in the Maryland PTA Bylaws to “keep your Chapter in good standing” will require the Local PTAs to “[y]ield up and surrender all of its books and records and all of its assets and property to Maryland PTA...Carry out promptly, under the supervision and direction of Maryland PTA, all proceedings necessary or desirable for the purpose of dissolving such constituent association.” These are among the consequences set forth in the Maryland PTA Bylaws for local units whose charters are revoked or dissolved. See **Exhibit 1** at Article VI, Section 10. Specifically:

⁵ Ms. Sanders, on behalf of the new local PTSA, also requested from Defendant Carrera a return of funds Maryland PTA had taken the prior year pending reinstatement of the local PTSA by Maryland PTA with a promise that the funds would be returned upon the local unit’s reinstatement with Maryland PTA. Sanders Aff. (**Ex. 7**) at ¶9. To date, the funds have not been returned. *Id.*

a. On August 4, 2021, Defendant Carrera sent an e-mail regarding the “[d]issolution process” to a Local PTA who had expressed that it did not want to join Alliance. *See Exhibit 8.* Despite the fact that the Local PTA stated specifically that it did not want to join *Alliance*, Defendant Carrera stated that she was “saddened to see [the Local PTA] *leave Maryland Congress of Parents and Teachers Inc.*” *Id.* (emphasis added). Defendant Carrera further recited provisions of the Maryland PTA Bylaws (Article VI, Section 10) requiring the Local PTA to provide “[a]ll of the books,” “[a]ll Financial records,” “[a]ll Bank Records,” and “Bank Statement from 2018 to current.” *Id.* The signature line of the e-mail identifies Defendant Carrera as “President of Maryland Congress of Parents and Teacher, Inc.” and the e-mail states that it is sent from “President-Maryland Congress of Parents and Teachers Inc.” *Id.*

b. In the September 6 Letter Defendant Carrera sent to Local PTAs (*see* Paragraph 12.b., *supra*), Defendants requested that local chapters who wish to disaffiliate from Maryland Congress of Parents and Teachers, Inc. follow Maryland PTA Bylaws’ procedures and turn over all records to Defendants: “For the Chapters that do not wish to no longer be a member of Maryland Congress of Parents and Teachers Inc. will need to fill out the included form and schedule time to meet with the staff to close out your books so that the information can be reported to the Maryland State and IRS. Contact us so the process can be started to close out your account properly.” **Exhibit 5**, Att. A at 7.

15. Finally, Defendants have continued to attempt to collect membership information and membership dues monies, as provided for by the Maryland PTA Bylaws acting as Maryland Congress of Parents and Teachers, Inc., from Local PTAs for state-level membership, Article V, Sections 1 (“Individual”), Article V, Section 2 (“State Supporting”), and Article VI, Section 13 (“Local PTAs”). **Exhibit 1.**

a. Defendant Carrera's September 6 Letter states that "[t]he membership dues tiers are attached to this letter... Chapters will be responsible for submitting their approved budgets, and Officers Lists and Membership dues payment." *Id.* **Exhibit 5**, Att. A at 5-6.

b. The September 6 Letter threatens that "any Chapter of Maryland Congress of Parents and Teachers Inc. *that has not paid their current dues and/or become compliant* . . . will be reported . . . *as not being part of the Maryland Congress of Parents and Teachers 501(c)3 Group Exemption* as stated with the IRS." **Exhibit 5**, Att. A at 7 (emphasis added).

c. Subsequent to entry of the Consent Order, Defendants' website www.mdpta.org has solicited membership dues from Local PTAs at various tiered levels. *See Exhibits 2 and 3.*

IV. Defendants' Continued Threats To Revoke Local PTAs' Tax Exempt Status

16. In the September 6 Letter to Local PTAs, Defendant Carrera threatens to interfere with Local PTAs' tax exempt status or EIN on the basis that "Maryland Congress of Parents and Teachers Inc. is considered the Parent Chapter Organization, the units are considered the subordinate chapter organizations under the group exemption" (**Exhibit 5**, Att. A at 3) and "[a] subordinate may also be terminated or revoked" (*id.* at 4).

17. Defendant Carrera further states "[w]ith respect to the termination of a subordinate's tax exempt status, the parent is obliged to notify the IRS Service that a subordinate no longer meets the requirements for inclusion in the group exemption letter." *Id.*

V. Plaintiff's Attempts to Seek Defendants' Compliance with the Consent Order

18. On September 9, 2021, Plaintiffs sent a cease and desist letter to Defendants to immediately cease all misconduct stated herein that violates the Consent Order. A copy of the September 9, 2021, letter from J. Pels to W. Johnson is attached hereto as **Exhibit 9**.

19. In response to Plaintiff's September 9, 2021 letter, counsel for Defendants responded on September 10, 2021, stating that "Defendants do not agree with the representations made in your letter." A copy of the September 10, 2021 letter from W. Johnson to J. Pels is attached hereto as **Exhibit 10**.

ARGUMENT

I. Constructive Civil Contempt Standard Under Maryland Rule 15-206

Under Maryland Rule 15-206, a party to an action in which alleged contempt occurred may initiate a proceeding for constructive civil contempt. Md. R. Spec. P. 15-206(b)(2). The purpose of civil contempt is to coerce present or future compliance with a court order. *Dodson v. Dodson*, 380 Md. 438, 448, 845 A.2d 1194, 1199–200 (2004) (citing *Long v. State*, 371 Md. 72, 89, 807 A.2d 1, 11 (2002) ("[T]he purpose of [sanctioning] the contemnor is remedial, ... i.e. 'to compel obedience to orders'"); *Ott v. Frederick County*, 345 Md. 682, 688, 694 A.2d 101, 105 (1997) ("[T]he purpose of civil contempt proceedings is to coerce future compliance"); *Rutherford v. Rutherford*, 296 Md. 347, 355, 464 A.2d 228, 233 (1983) ("[T]he purpose of the contempt proceedings ... was to coerce the defendants to comply with court orders"); *McDaniel v. McDaniel*, 256 Md. 684, 689, 262 A.2d 52, 55 (1970) (The sanction "for civil contempt ... is intended to be remedial by coercing the defendant to do what he has refused to do"))).

Before a party may be held in contempt of a court order, "the failure to comply with the court order [must be] willful." *Dodson*, 380 Md. at 452, 845 A.2d 1194. Willful conduct is action that is "[v]oluntary and intentional, but not necessarily malicious." *Royal Inv. Grp., LLC v. Wang*, 183 Md. App. 406, 451, 961 A.2d 665, 691 (2008) (citing Black's Law Dictionary 1630 (8th ed. 2004)); *Wells v. Polland*, 120 Md.App. 699, 719, 708 A.2d 34 (1998) ("Willful misconduct is performed with the actor's actual knowledge or with what the law deems the equivalent to actual knowledge of the peril to be apprehended, coupled with a conscious failure to avert

injury.”)). When the conduct in contravention of a court order has been proven by a preponderance of the evidence to be willful, the defendant may be held in contempt. *Id.*; see also *Dodson*, 380 Md. at 452, 845 A.2d at 1199; *Bahena v. Foster*, 164 Md.App. 275, 286, 883 A.2d 218 (2005).

Finally, where the conduct is “egregious,” a court may impose “a monetary sanction in a civil contempt proceeding to compensate for damages caused by the contemnor.” *State v. Wilson*, 2017 WL 5450749, at *10 (Md. Ct. Spec. App. Nov. 14, 2017) (citing *Royal Inv. Grp., LLC*, 183 Md. App. at 453-54, 961 A.2d 665; *Dodson*, 380 Md. at 454, 845 A.2d 1194).

II. Defendants Should Be Held In Constructive Civil Contempt of the Consent Order for Engaging In Willful Conduct In Violation of the Consent Order

As set forth in detail at Paragraphs 11-17, *supra*, Defendants have engaged in ongoing, willful, voluntary and intentional conduct in violation of Consent Order, Section (i), which prohibits Defendants from taking any actions operating under the Maryland PTA bylaws. See D.E. # 15. Defendants have also willfully, voluntary and intentionally failed to comply with Consent Order, Section (v), which prohibits Defendants from, “for a period of thirty (30) days [following the entry of the Consent Order], seeking, or otherwise causing, the Internal Revenue Service (“IRS”) to revoke Local PTAs’ 501(c)(3) status or EINs without Local PTAs’ consent,” and requires Defendants to engage in “communications [with Plaintiff] in good faith to attempt to resolve the issue.” *Id.* Despite multiple communications from Plaintiff’s counsel requesting Defendants to cease and desist their conduct in violation of the Consent Order (see Paragraphs 8, 10, 18-19, *supra*), Defendants have voluntarily and intentionally refused to comply with the Consent Order.

Defendants’ actions as set forth herein were voluntary and intentional. Specifically, Defendants have continued to engage in these actions despite the July 1, 2021 Letter, July 8, 2021 e-mail, and September 9, 2021 Letter from Plaintiff’s counsel requesting Defendants to cease and

desist their conduct in violation of the Consent Order. Moreover, Defendants did not attempt to provide any explanation for or defense of their conduct in violation of the Consent Order. *See* Paragraphs 10 and 19, *supra*. Defendants' actions constitute willful violations of the Consent Order, *Royal Inv. Grp., LLC*, 183 Md. App. at 451, 961 A.2d at 691, and Defendants should be held in constructive civil contempt of the Consent Order. Md. R. Spec. P. 15-206(b)(2); *Dodson*, 380 Md. at 448, 845 A.2d at 1199–200.

The Court should find that Defendants are in constructive civil contempt of the Consent Order and order Defendants to purge the contempt by immediately complying with all aspects of the Consent Order.

III. Defendants Actions In Violation of the Contempt Order Are Egregious and Warrant Imposition of Monetary Sanctions

Defendants ongoing, willful actions described above are egregious and warrant imposition of monetary sanctions, including but not limited to attorney's fees. *Wilson*, 2017 WL 5450749, at *10.

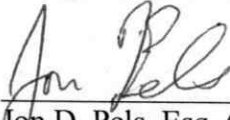
CONCLUSION

WHEREFORE, Plaintiff respectfully requests the Court to order Defendants to appear in Court and show cause why an order for contempt should not be passed, and impose sanctions, including but not limited to attorney's fees.

(signature page follows)

Respectfully submitted,

THE PELS LAW FIRM


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Counsel for Plaintiff National PTA

Dated: October 1, 2021

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2021, I caused a copy of the foregoing Motion for Contempt and Order to Show Cause to be served via USPS First Class Mail, postage pre-paid, and a courtesy copy via e-mail on:

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Counsel for Defendants


Jon D. Pels, Esq. (CPF # 9312160037)

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, MARYLAND

NATIONAL CONGRESS OF PARENTS
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Plaintiff,

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LATONJA CARRERA, *et. al*,

Defendants.

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SHOW CAUSE ORDER FOR CONTEMPT

Upon consideration of Plaintiff's Motion for Contempt and Order to Show Cause, it is hereby ORDERED that Defendants appear in person before this Court on _____ at _____ to show cause why this Court should not find them in contempt for refusing to comply with the June 15, 2021 Consent Order, entered on the docket on June 21, 2021.

So ORDERED this ____ day of _____, 2021.

JUDGE, Circuit Court for Montgomery
County, Maryland

Copies to:

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