From: (b) (6) - Privacy
To: Title VI Complaints
Subject: Complaint against Maryland Department of the Environment alleging violations of Title 6 Civil Rights Act (Race and/or National Origin)
Date: Monday, August 24, 2015 9:24:43 AM

Dear Sir or Madam,

My name is (b) (6) - Privacy I am an African American male. I was born and raised in the United Kingdom of Nigerian parents and I am a naturalized U.S citizen. I came to the United States as an adult and retain my foreign accent. I reside in Maryland.

I wish to file a complaint against the Maryland Department of the Environment (MDE) under Title VI of the Civil Rights Act, for discrimination against me in their enforcement practices, due to my race and/or national origins.

The summary of my complaint of discrimination is as follows:

1) MDE is the recipient of EPA financial grants and/or other types of financial assistance and therefore, EPA has the jurisdiction under Title VI to investigate complaints of discrimination by MDE based on race and/or national origin
2) MDE filed and maintains a baseless lawsuit against me in Baltimore City Circuit Court, Case No. (b) (6) - Privacy as a form of alleged enforcement action, alleging violations of the Md. Lead Paint law (failure to register properties and failure to obtain requisite lead paint compliance certificates) and requesting up to $69 million damages and injunctive relief for properties that are in compliance with Md law and lead free.
3) One of the properties subject of the lawsuit is not owned by me and was not owned by me when MDE visited the property and then filed the lawsuit. That property is certified lead free and MDE knows this.
4) The lawsuit was initiated by MDE as a form of harassment/discrimination, not initiated by a tenant complaint. There are no allegations of lead poisoning or harm to either persons or the environment in the lawsuit.
5) MDE filed said lawsuit without first issuing a notice of violation to me, contrary to its usual stated practice.
6) The said lawsuit is being continued in bad faith as a form of discrimination against me. I have tried to have the lawsuit dismissed by providing evidence of the status of the properties as certified lead free, but MDE persists in this lawsuit.
7) MDE is discriminating against me because it does not file lawsuits against people who are U.S born and/or not African-American, without first issuing them a notice of violation and thus giving the person an opportunity to get in compliance with Md law.
8) One of MDE employees, (b) (6) - Privacy at the occasion of a recent hearing at the Md Office of Administrative Hearings, threw some papers at my feet outside in the parking lot and said to me: 'we don't like foreigners'.
9) Recently, MDE Secretary Horacio Tablada, confirmed that MDE's practice is to issue notices of alleged violations prior to initiating any enforcement action. See Article in Baltimore Sun, dated August 21, 2015 http://www.baltimoresun.com/news/maryland/bs-md-lead-letters-20150821-story.html
10) I am ready to provide additional information concerning all of the above allegations as and when you require it.

I look forward to hearing from you.

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