

**COMPLAINT (HOLLIS SCHOOL BOARD/SAU 41) AND NOTICE OF INTENT TO FILE WITH STATE BOARD OF EDUCATION AND EDUCATION COMMISSIONER, FRANK EDELBLUT.**

*To: ANDREW COREY, INDIVIDUALLY AND AS AUTHORIZED AGENT FOR SAU 41; HOLLIS SCHOOL BOARD;  
TAMMY FAREED CC: STATE BOARD OF EDUCATION AND EDUCATION COMMISSIONER, FRANK EDELBLUT*

**SUMMARY OF COMPLAINT:**

On August 11th, 2021 The Hollis School Board held a public hearing and meeting to consider a school wide mandate requiring all students and teachers to wear personal protective masks as part of the Hollis Public Schools' reopening plan. The hearing was duly noticed to the public. Pursuant to the requirements of due process, the public was provided the right to address the issue to the Board. The Board received the testimony of numerous parents, citizens and experts. At that time the board voted to accept the reopening plan including a mask mandate. Tammy Fareed was the Chairperson of the Hollis Public School Board and voted in favor of the plan and mask mandate along with the rest of the board.

In late August 2021, members of the public who wrote to SAU 41 school officials asking them to rescind mandatory school mask mandate received correspondence from Tammy Fareed, who acted as spokesperson for these officials in support of the Hollis Public School's mandatory mask policy. One such email exchange which was copied to a group of Hollis Public School board members and SAU 41 officials and contained the following statement by Ms. Fareed indicating a serious conflict of interest relating to the issue of mask policy in the Hollis Schools (See Exhibit A):

**"I have direct familiarity with the nano-technology of high-efficiency masks thanks to a family member who holds patents in the field of filtration related to these materials and works for an American company that has a long, proud history of supplying such materials for clean room filters, N95 and other masks (for which the federal government awarded a multimillion dollar contract in mid-2020), ventilator filters (80% of the American market), and much, much more. I am familiar with the science (from electron microscopy on up) and the practicum of masking. This familiarity gives me all the more confidence in the many public agencies and industrial institutions staffed by thousands of medical and engineering professionals responsible for lives who call for masking as a major mitigation against viral spread."**

**Tammy  
us**

**"Thou shalt not bear false witness."**

The following SAU 41 school officials were copied in the email exchange that contained this statement and could reasonably have been expected to raise the issue of a potential conflict of interest relating to the issue of the school's mask policy on the part of Ms. Fareed since her husband owns mask material patents and his company makes them. Apparently, none of these school officials raised the issue since Ms. Fareed continued her role as spokesperson and advocate for the schools' mask policy and voting member of the board relating to school mask policy. This may also reasonably be considered an ethics violation on the part of these school officials:

Andrew Corey, Superintendent of SAU 41

Paula Izbicki

Candace Fowler

Brooke Arthur

Amy Kellner

Robert Mann

Carryl Roy

Patricia Bouley

Daniel Molinari

Kenneth Haag

Rebecca Howie

Alison Marsano

Karen Jew

Erin Sarris

At the September 1, 2021 meeting of the Hollis School Board a group of parents asked the board to reconsider its mask policy during the public comment portion of the meeting. Additionally, all of the board members and school officials present were presented with a petition and research document directly addressing Tammy Fareed's arguments in support of masking which was signed by 95 citizens asking that this board's mandatory mask policy be rescinded. To date, neither Tammy Fareed nor any member of the board or school official has responded to the petition and research letter.

On October 6, 2021 Tammy Fareed took the lead in promoting the school's mandatory mask mandate. As a matter of public record (her statements are recorded on the video of the public hearing) she asserted that she had vast expertise on the subject of masks because her husband's company made the anti-viral efficiency materials inside 80% of all ventilators in of the United States in Virginia through the company's plant. She went on to say that every mask people could see worn by the other board members around her had her husband's material in it.

While Ms. Fareed has cited her husband's materials and patents to validate her own expertise, in truth what she has done is admit that she has a direct pecuniary interest in the sale of the very types of masks that many of the children and adults in the children in Hollis Schools are now required to wear in school. Tammy Fareed, by her own comments, prejudged the issue, advocated in favor of the school's mask mandate, and successfully led a vote to require the Hollis Primary school to wear masks as part of the Hollis Primary School's reopening plan on August 11, 2021. Furthermore, though over 100 citizens, and stakeholders have petitioned Ms. Fareed, Superintendent Corey and the SAU 41 school boards in writing

and in their public comments to rescind this mask mandate, Ms. Fareed has remained an outspoken proponent and defender of the mask mandate often acting as a spokesperson for the board on this issue.

The focus of this complaint is the vote of the Hollis Primary school Board on August 11, 2021 to require masks of all students and teachers within its jurisdiction and the board's continued support of this policy subsequent to that date. The basis for the complaint is the conflict of interest revealed by Tammy Fareed out of her own mouth and in her written correspondence and as verified below by investigation into Tammy Fareed's husband's business income from the patents she spoke of.

**DEMAND FOR RECUSAL OF THE HOLLIS PRIMARY SCHOOL BOARD FROM THE INVESTIGATION AND ADJUDICATION OF THIS COMPLAINT:** As shown below, clear New Hampshire law, as explained by the New Hampshire Supreme Court, provides that Tammy Fareed should have recused herself from the vote taken and since the Hollis School Board and Superintendent Corey and Assistant Superintendent Bergskaug have been made aware of Ms. Fareed's conflict of interest by virtue of her public comment and her written materials and have not acted to address this ethical violation, the entire Hollis School Board and the Superintendent's office should not be adjudicating their own ethical and legal violations. This matter should therefore be referred directly to the State Board of Education for an impartial, fair and unprejudiced hearing.

**FACTS:** Tammy Fareed is the Chairperson of the Hollis School Board. On October 6, 2021, a review of the reopening plan for the Hollis public schools including the policy of mandatory masking for school children and teachers took place. The meeting was scheduled in advance, taking place on its regularly scheduled monthly time which is the first Wednesday of the month. Notice was provided to the public on the school website and the agenda was made available to the public in advance of the meeting. The meeting took place including a hearing of public comment at the beginning of said meeting. During the meeting, as recorded on video, Tammy Fareed made the following statements:

"I think it's clear I'm a person who wants to err on the side of safety. I could wear you all out completely with long, long discussions of what I've learned about *these masks* (pointing to her own) *and other masks etc.* My husband's company makes the anti-viral efficiency materials inside 80% of all ventilators in of the United States in Virginia through the company's plant. **Every mask that you see up here** (waving her hand to indicate her own masks and those of the other board members around her) **has my husband's materials in it.** N95's, higher than that, N 100's etc."

Following this public admission made by Ms. Fareed, the Hollis School Board took no action to rescind the mandatory masking of children and adults in the school despite the testimony of citizens present in which they asked the board to do so. No member of the school Board, nor any member of the administration voiced any objections to Tammy Fareed's admitted Conflict of Interest.

#### **TIMELINE:**

- 1) The school board's voted on August 11, 2021 to mandate mandatory masking of children and adults at the Hollis Primary school as part of the school's reopening plan
- 2) Tammy Fareed's written statement concerning her family member's interest in mask material filtration patents and manufacturing was in the form of an e-mail dated August 28, 2021 to various parties.

- 3) Ms. Fareed's public statement on October 6, 2021 about her husband's patented material used in the masks worn by board members and others.
- 4) Ms. Fareed's continuing defense of the school's mask mandate and actions as spokesperson for this policy and Chairperson of the Hollis School Board.

An investigation was done by the complaining parties of public records to gain greater understanding of Tammy Fareed's statements about her husband's (and her) financial interest in the manufacture of masks. By internet search Ms. Fareed's husband, Mr. John Wertz, was found to own the very patents claimed by Tammy Fareed and used in the manufacture of masks by Hollingsworth & Vose by whom he is employed or economically advantaged.

**Tammy Fareed (Hollis SB)**

August 28, 2021 at 6:17 PM



Re: Rescind the Masking of our children.

[Hide](#)

Cc: Corey, Andrew, Paula Izbicki, Candice Fowler, Brooke Arthur(HSB), Amy Kellner, Robert Mann (HSB), Carryl Roy HSB, patricia.bouley@sau41.org, daniel.molinari@sau41.org, Kenneth Haag, rebecca.howie@sau41.org, Alison Marsano BSB, Karen Jew, erin.sarris@sau41.org

I watched the video all the way through - I take seriously the information shared with me by any Hollis resident. I also researched the woman's professional background and dismissed court cases, refutation of her views by major industrial hygiene trade associations, etc.

I have direct familiarity with the nano-technology of high-efficiency masks thanks to a family member who holds patents in the field of filtration related to these materials and works for an American company that has a long, proud history of supplying such materials for clean room filters, N95 and other masks (for which the federal government awarded a multimillion dollar contract in mid-2020), ventilator filters (80% of the American market), and much, much more. I am familiar with the science (from electron microscopy on up) and the practicum of masking. This familiarity gives me all the more confidence in the many public agencies and industrial institutions staffed by thousands of medical and engineering professionals responsible for lives who call for masking as a major mitigation against viral spread.

Tammy



"Thou shalt not bear false witness."

**Exhibit A: Email from Tammy Fareed copying school officials**

**Exhibit B: This is a partial list of John Wertz's filtration patents registered with the United States patent office.**

For a full list of John Wertz's patents: <https://patents.justia.com/inventor/john-a-wertz>

#### **FINE FIBER FILTER MEDIA AND PROCESSES**

**Publication number:** 20210129061

**Abstract:** Fine fiber products including fiber webs, as well as related assemblies, systems and methods, are described. In some embodiments, fiber webs described herein may include fine fibers and relatively low amounts of degraded polymer formed during a fiber extrusion process. The fiber webs may be used for filter media applications.

**Type:** Application

**Filed:** November 11, 2020

**Publication date:** May 6, 2021

**Applicant:** Hollingsworth & Vose Company

**Inventors:** Stephen T. Cox, William S. Freeman, Abdoulaye Doucouré, John A. Wertz

#### Fine fiber filter media and processes

**Patent number:** 10874962

**Abstract:** Fine fiber products including fiber webs, as well as related assemblies, systems and methods, are described. In some embodiments, fiber webs described herein may include fine fibers and relatively low amounts of degraded polymer formed during a fiber extrusion process. The fiber webs may be used for filter media applications.

**Type:** Grant

**Filed:** October 25, 2018

**Date of Patent:** December 29, 2020

**Assignee:** Hollingsworth & Vose Company

**Inventors:** Stephen T. Cox, William S. Freeman, Abdoulaye Doucouré, John A. Wertz

#### FILTER MEDIA WITH A MULTI-LAYER STRUCTURE

**Publication number:** 20190168143

**Abstract:** Filter media are described. The filter media may include multiple layers. In some embodiments, the filter media include a nanofiber layer adhered to another layer. In some embodiments, the layer to which the nanofiber layer is adhered is formed of multiple fiber types (e.g., fibers that give rise to structures having different air permeabilities and/or pressure drops). In some embodiments, the nanofiber layer is adhered to a single-phase or a multi-phase layer. In some embodiments, the nanofiber layer is manufactured from a meltblown process. The filter media may be designed to have advantageous properties including, in some cases, a high dust particle capture efficiency and/or a high dust holding capacity.

**Type:** Application

**Filed:** October 25, 2018

**Publication date:** June 6, 2019

**Applicant:** Hollingsworth & Vose Company

**Inventors:** John A. Wertz, Douglas M. Guimond

#### FINE FIBER FILTER MEDIA AND PROCESSES

**Publication number:** 20190126177

**Abstract:** Fine fiber products including fiber webs, as well as related assemblies, systems and methods, are described. In some embodiments, fiber webs described herein may include fine fibers and relatively low amounts of degraded polymer formed during a fiber extrusion process. The fiber webs may be used for filter media applications.

**Type:** Application

**Filed:** October 25, 2018

**Publication date:** May 2, 2019

**Applicant:** Hollingsworth & Vose Company

**Inventors:** Stephen T. Cox, William S. Freeman, Abdoulaye Doucouré, John A. Wertz

#### Fine fiber filter media and processes

**Patent number:** 10155186

**Abstract:** Fine fiber products including fiber webs, as well as related assemblies, systems and methods, are described. In some embodiments, fiber webs described herein may include fine fibers and relatively low amounts of degraded polymer formed during a fiber extrusion process. The fiber webs may be used for filter media applications.

**Type:** Grant

**Filed:** June 20, 2012

**Date of Patent:** December 18, 2018

**Assignee:** Hollingsworth & Vose Company

**Inventors:** Stephen T. Cox, William S. Freeman, Abdoulaye Doucoure, John A. Wertz

#### Filter media with a multi-layer structure

**Patent number:** 10155187

**Abstract:** Filter media are described. The filter media may include multiple layers. In some embodiments, the filter media include a nanofiber layer adhered to another layer. In some embodiments, the layer to which the nanofiber layer is adhered is formed of multiple fiber types (e.g., fibers that give rise to structures having different air permeabilities and/or pressure drops). In some embodiments, the nanofiber layer is adhered to a single-phase or a multi-phase layer. In some embodiments, the nanofiber layer is manufactured from a meltblown process. The filter media may be designed to have advantageous properties including, in some cases, a high dust particle capture efficiency and/or a high dust holding capacity.

**Type:** Grant

**Filed:** December 30, 2015

**Date of Patent:** December 18, 2018

**Assignee:** Hollingsworth & Vose Company

**Inventors:** John A. Wertz, Douglas M. Guimond

#### Meltblown filter medium, related applications and uses

**Patent number:** 8986432

**Abstract:** Filter media, as well as related assemblies, systems and methods. Filter media may contain one or more layers formed of a meltblown material.

**Type:** Grant

**Filed:** July 1, 2009

**Date of Patent:** March 24, 2015

**Assignee:** Hollingsworth & Vose Company

**Inventors:** John A. Wertz, David T. Healey, William S. Freeman, John L. Manns, Mark Rowlands

#### **Exhibit C: A print out of a web site reflecting Mr. Wertz's company, Hollingsworth & Vose.**

The entire web site documents all that Tammy Fareed said about her husband's financial interest in in the sale of masks in the USA. The page printed reflects a kn95 (which on information and belief is made in China) mask which contains his patented materials.

<https://www.hollingsworth-vose.com/brands/alphaperm/>

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low pressure drop even at high levels of efficiency, thus providing superior comfort, low noise levels, and low energy consumption. AlphaPerm® technology can be used as a standalone layer, or as part of a composite alongside other Hollingsworth & Vose innovative technologies.

**AlphaPerm™ filtration media is a 100% synthetic meltblown**, delivering the highest levels of filtration efficiency while also minimizing air resistance, thus ensuring optimal comfort for a mask wearer or lower cost of ownership to a commercial HVAC operator. As the most widely used filtration material in the world, it's also found in appliance filtration systems such as room air filters. It's the performance standard for commercial air handling applications. AlphaPerm™ filter media composites are highly charged, with superior pleatability on rotary and blade pleaters.



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AlphaPerm™ comes with many features that make it the best solution for filtration. Some of these key features include:

- A design featuring 100% synthetic materials to provide reliable durability and superior resistance to damage throughout filter manufacturing and installation
- Meets NIOSH N95, N99 and N100, and EN149 FFP2 and FFP3 standards after loading and heat aging as per respective standard
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- Lowest possible pressure drop product in its category for optimal performance
- Designed to process on both blade and rotary pleaters for deep and mini pleat applications

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**Exhibit D:** The video of the October 6th Hollis Public School Board meeting in which Tammy Fareed states her husband's interest in mask manufacturing.

The meeting recording can be found at:

<https://www.youtube.com/channel/UCq5vp1bbNQ-RipwQOgiroCQ>

Ms. Fareed's statement occurred 1:02:24 in the recording.



### **APPLICABLE REGULATIONS AND LAWS:**

It is the assertion of the undersigned that Tammy Fareed has a conflict of interest.

*A CONFLICT OF INTEREST IS WELL DEFINED in New Hampshire law:*

Under RSA 21-G:22, a public official is precluded from participating in “any matter in which they, or their spouse or dependents, have a private interest which may directly or indirectly affect or influence the performance of their duties.”

In *Marsh v Town of Hanover*, 113 N.H. 667 (1973) provided that:

“In New Hampshire, the requisite personal interest has been defined as a pecuniary interest which is immediate, definite, and capable of demonstration; not remote, uncertain, contingent and speculative, that is such that men of ordinary capacity and intelligence would not be influenced by it.”

In the Hollis School Board’s “Board Member Code of Ethics” it is written that the Board has the responsibility to:

*“Represent the entire community without fear of favor, while not using the position of School Board member for personal or financial gain or benefit to self”*

...

*“Preserve the obligation of having all issues considered fairly and without bias.”*

Based upon applicable law, Tammy Fareed clearly has a **conflict of interest**. Her only option, and the only option of the Board, was to recuse her from the vote on masks. She did not. Nor did any member of the Board object to her conflict of interest. The only remedy is to declare the vote on masking, entered by the Board on August 11, 2021 as void.

**THE VOTE OF THE BOARD WAS JUDICIAL IN NATURE AND THEREFORE THE CONFLICT OF INTEREST OF TAMMY FAREED REQUIRES THAT ALL MEMBERS OF THE BOARD BE RECUSED FROM THE VOTE; THE VOTE DECLARED VOID.**

In *Winslow v Holders Planning* 125 N.H. 262 (N.H.1984), the Court held that when a Board, such as the Hollis School Board acts in a judicial or quasi-judicial capacity, then a finding of bias/conflict of interest by one board member, requires reversal of the actions taken. The court reasoned that due to the requirements of due process, and because it cannot be determined the influence of the conflicted member on other board members, all actions taken by the Board as whole on the subject in question is rendered void.

**CONCLUSION: WE THE UNDERSIGNED SUBMIT THAT TAMMY FAREED HAS A DISQUALIFYING CONFLICT OF INTEREST ON THE ISSUE OF MANDATORY MASKS.**

**HER HUSBAND’S OWNERSHIP OF PATENTS USED IN THE MANUFACTURE OF THE TYPES OF MASKS WORN BY NUMEROUS CHILDREN AND ADULTS AT THE HOLLIS**

**PUBLIC SCHOOL AS A RESULT OF THE MASK MANDATE THAT SHE HAS PERSONALLY PROMOTED AND VOTED IN FAVOR OF IN HER ROLE AS CHAIRMAN OF THE SCHOOL BOARD SATISFIES THE REQUIRED SHOWING OF A PECULIAR, SPECIFIC PECUNIARY INTEREST.**

**MOREOVER, BECAUSE THE HEARING WAS NOTICED, THE PUBLIC GIVEN OPPORTUNITY TO APPEAR AND BE HEARD, THE HEARING ON THE ISSUE WAS JUDICIAL OR QUASI JUDICIAL AND AS SUCH, THE APPLICABLE LAW REQUIRES A REVERSAL OF THE VOTE IN ITS ENTIRETY AND A RECUSAL OF THE ENTIRE BOARD FROM ANY FURTHER INVOLVEMENT IN THE ISSUE OF MASKING.**

**BECAUSE THE BOARD CANNOT PROPERLY AND WITHOUT BIAS ADJUDICATE ITS OWN MALFEASANCE, WE DEMAND THAT THEY RECUSE THEMSELVES FROM THIS COMPLAINT AND REFER IT ON TO THE STATE BOARD OF EDUCATION.**

**IN THE ALTERNATIVE, THE BOARD COULD DECLARE THE VOTE TO BE VOID FOR THE REASONS STATED ABOVE.**

**SIGNED BY THE FOLLOWING PARENTS, CITIZENS, AND STAKEHOLDERS:**

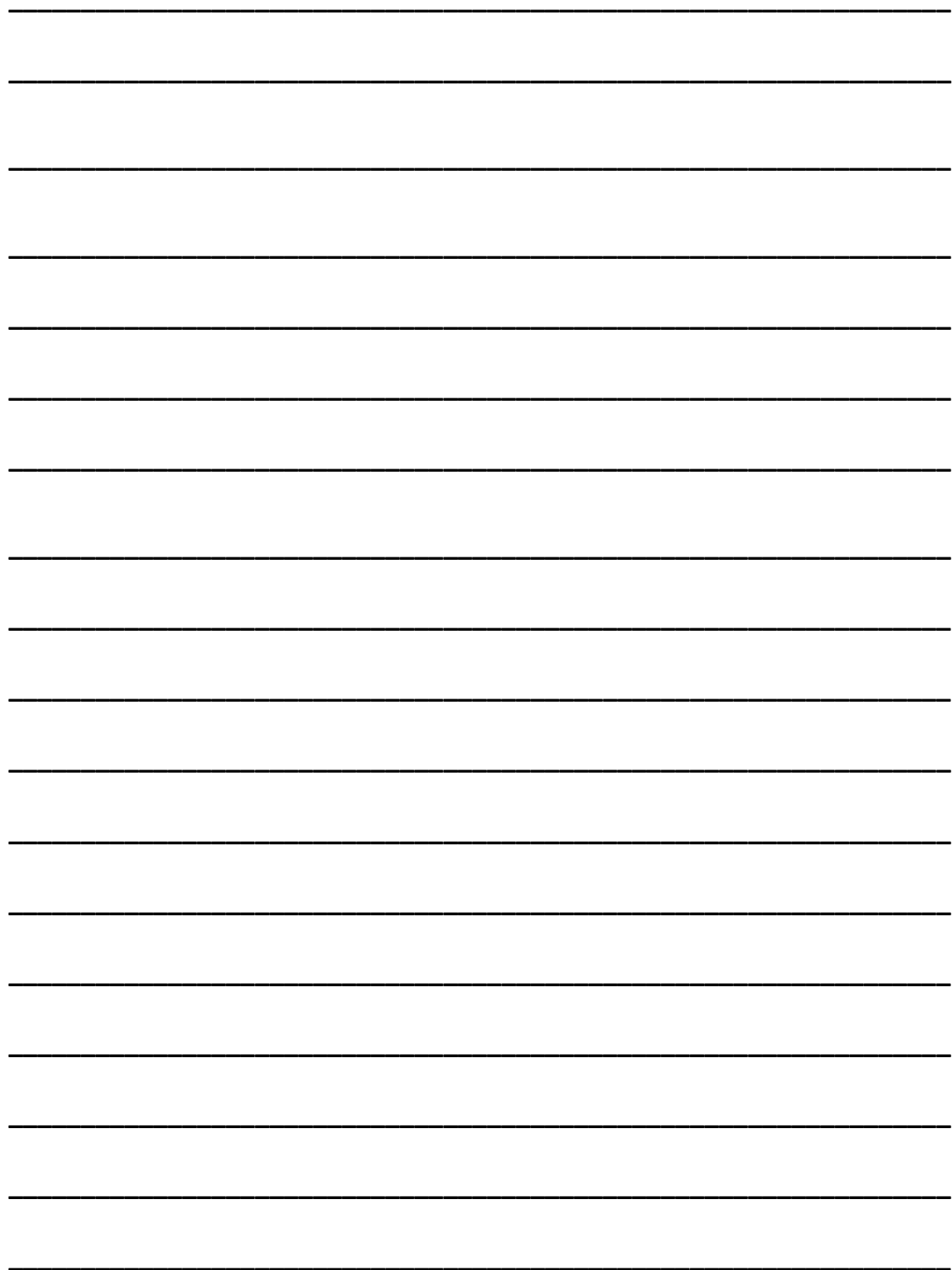
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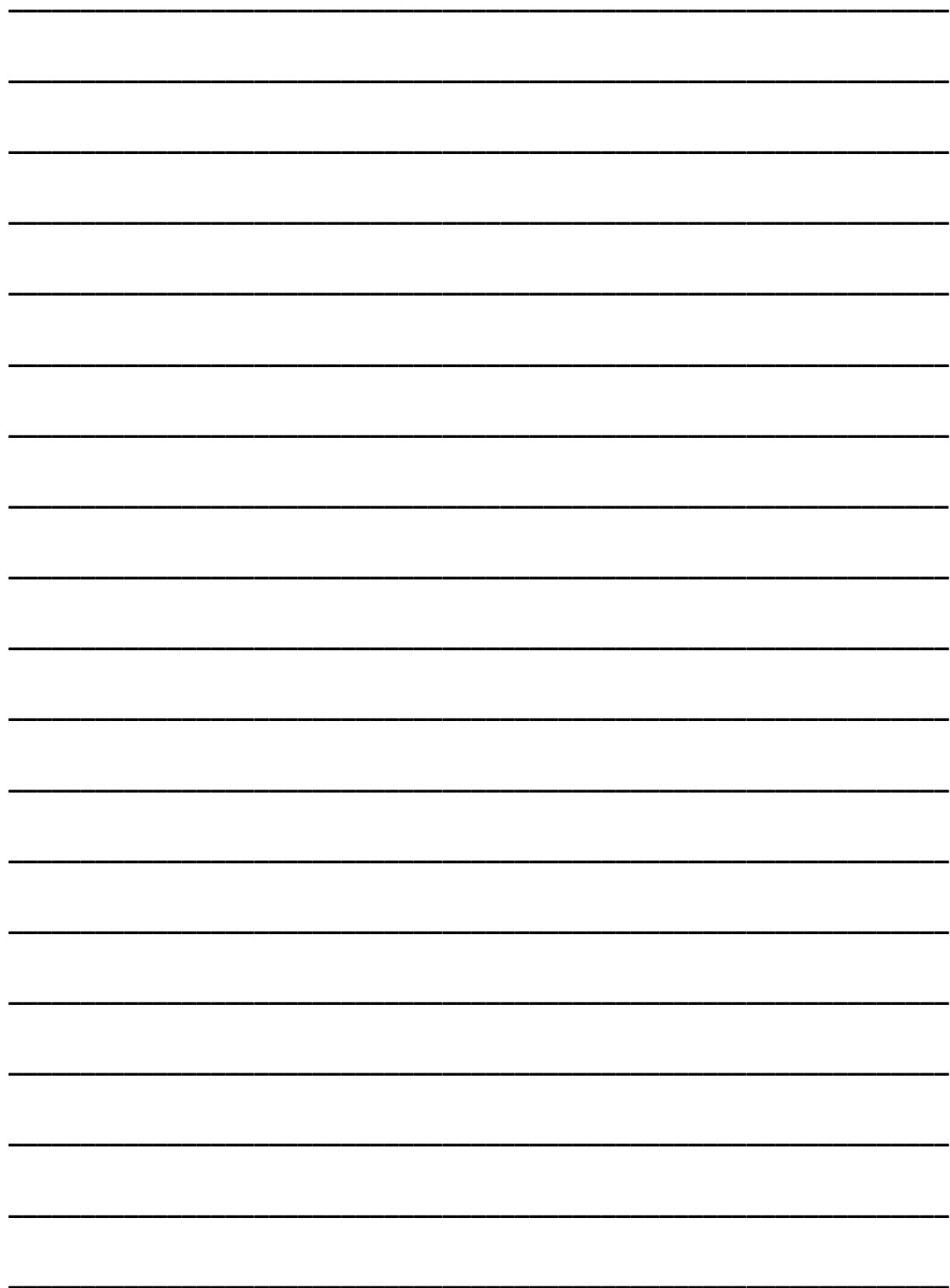
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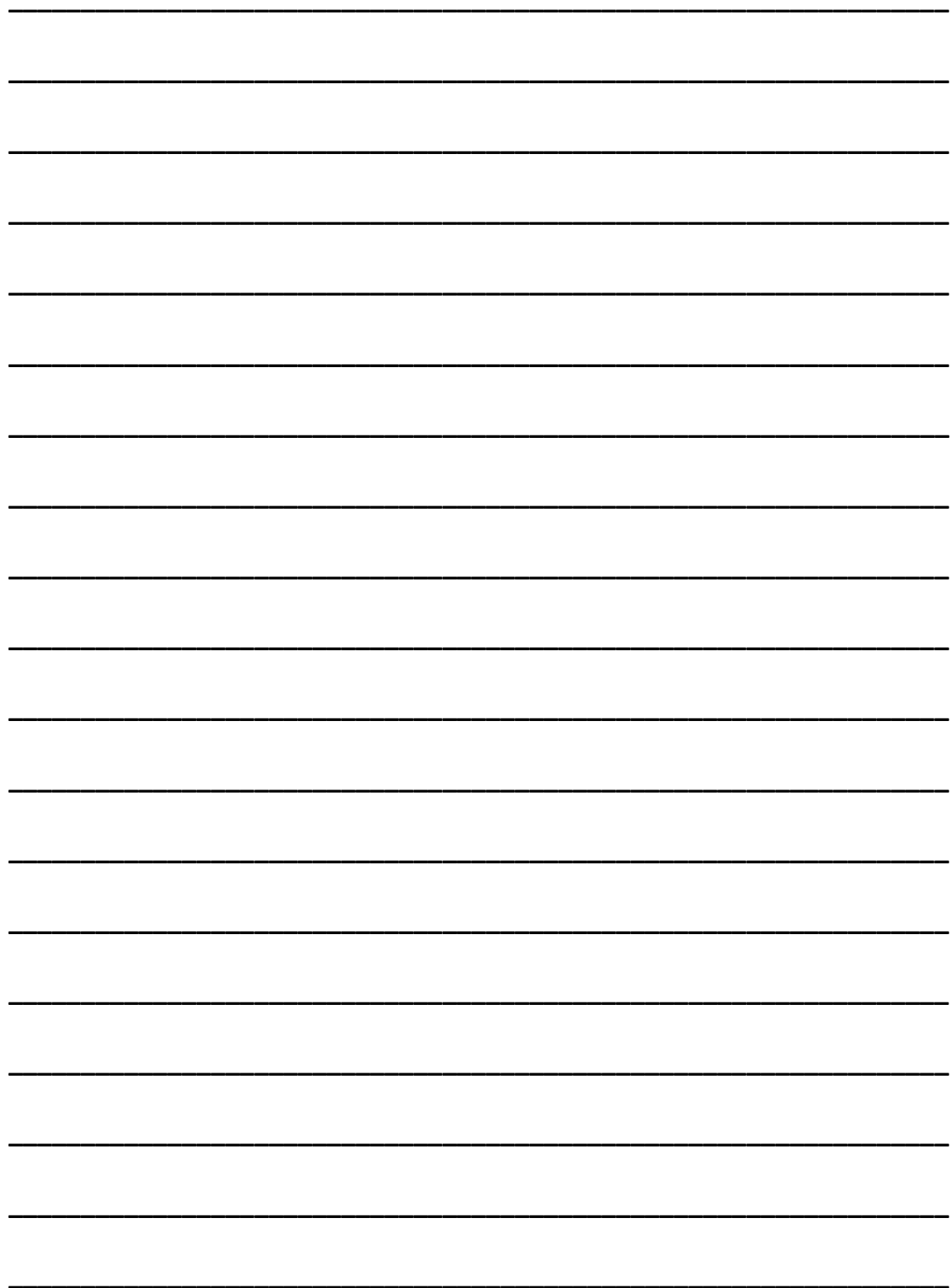
**SIGNATURE**

## ADDRESS

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