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IN THE CIRCUIT COURT OF MARYLAND FOR PRINCE GEORGE'S COUNTY
14735 Main Street, Upper Marlboro, Maryland 20772

JAMES E. CARPENTER,
c/o Justly Prudent
16701 Melford Blvd., Suite 400,
Bowie, MD 20715

Case No. C-16-CV-26-002878

DEMAND FOR JURY TRIAL

Plaintiff,

v.

PRINCE GEORGE'S COUNTY, MD,
c/o Anthony Jones
County Attorney
1301 McCormick Drive, Suite 4100
Largo, MD 20774

PAUL SPARACINO,
8801 Police Plaza
Upper Marlboro, MD 20772

JEFFREY HIGGINS,
601 Crain Hwy
Upper Marlboro MD 20774

Defendants.

COMPLAINT FOR UNLAWFUL RETALIATION IN EMPLOYMENT

Plaintiff James E. Carpenter, for his complaint against Defendants Prince George's County, Maryland (the "County"), Paul Sparacino, in his individual capacity ("Sparacino"), and Jeffrey Higgins, in his individual capacity ("Higgins"), alleges the following:

1. James Carpenter is an African-American police corporal who has served the Prince George's County Police Department ("PGCPD") for 19 years. Carpenter supported two colleagues, one Black and one white, who filed charges of race discrimination against Sergeant Paul Sparacino and Lieutenant Jeffrey Higgins, the same supervisors who supervised Carpenter.

After Carpenter offered that support, Sparacino and Higgins began a sustained campaign of retaliation against him. The retaliation began in March 2023, intensified each time Carpenter renewed his protected activity, and continues to the present day.

2. The retaliation took the form of two falsified annual performance appraisals, the removal of Carpenter's supporting documentation from his rebuttal package, the addition of a five-page negative supervisory rebuttal to his personnel file without notice or consent, the supervisors' decision to conceal that rebuttal from Carpenter for 17 months, the denial of overtime, the denial of training that cost Carpenter his elected seat on the Board of Directors of the Southeast Chapter of the International Association of Auto Theft Investigators, the loss of his federal deputization with the FBI Washington Field Office, the redirection of his case assignments to other officers, and the withholding of backup support during high-risk operations.

3. The retaliation reached its most serious form on December 30, 2024, when the County submitted an altered version of Carpenter's 2023–2024 Past Performance Appraisal to the U.S. Equal Employment Opportunity Commission ("EEOC") in support of the County's position statement. The submitted document contained a check mark in a box that Carpenter had expressly declined to mark and that does not appear on his retained original. After Carpenter notified the EEOC of the alteration through a reply submission that included side-by-side copies of the original and altered documents, the County never responded.

4. The same supervisors who presumably falsified Carpenter's records also contemporaneously nominated him for an Exemplary Performance Award and a Special Achievement Award covering the very same rating period in which they assigned him a "Needs Improvement" rating in the category of "Investigations."

5. Carpenter is not the only officer in the WAVE unit to have come forward against the same supervisors. Corporal Brandon Flax, who is African-American, filed an EEOC charge against Sparacino and Higgins in November 2023 and was transferred out of the unit. Corporal David Gross, who is Caucasian, filed an EEOC charge against Sparacino and Higgins in July 2024 in which he identified three African-American officers in the unit (Corporal Flax, Sergeant Hall, and Carpenter) as the officers Sparacino and Higgins were targeting; Gross was likewise transferred out of the unit. Sergeant Tariq Hall, who is African-American and who served in the same chain of command, was suspended for 17 months on a fabricated theft investigation initiated by Sparacino and Higgins, and was exonerated on all 20 charges in February 2025.

6. After Carpenter filed his own EEOC charge in October 2024, Sparacino was transferred to the PGCPD's Internal Affairs Division, and Higgins was transferred out of the WAVE unit.

7. In August 2025, the Prince George's County Office of the Chief sustained the grievance and replaced the altered the 2022–2023 and 2023–2024 Past Performance Appraisals (“PPA”) in Carpenter's personnel file with revised appraisals reflecting overall “Outstanding” ratings of 3.85, each bearing the notation that the supervisor-comment and supervisor-recommendation sections “remain[] blank pursuant to a grievance resolution.” Notwithstanding this resolution, the County imposed no discipline on Sparacino or Higgins.

8. Carpenter then filed an Internal Affairs complaint on September 8, 2025, requesting that the matter be referred to an outside agency in light of Sparacino's new assignment. The County acknowledged receipt of the complaint the same day, conducted a single recorded interview of Carpenter on October 22, 2025, and has not communicated with him about the matter since.

9. Carpenter brings this action under Section 1 of the Ku Klux Klan Act of 1871, codified as 42 U.S.C. § 1983, to vindicate rights secured by Section 1 of the Civil Rights Act of 1866, codified as 42 U.S.C. § 1981, Title VII of the Civil Rights Act of 1964, as amended, the Maryland Fair Employment Practices Act, and the Prince George's County Code.

JURISDICTION AND VENUE

10. The Court has jurisdiction over this action under Md. Code Ann., Cts. & Jud. Proc. § 1-501.

11. Venue is proper in this Court under Md. Code Ann., Cts. & Jud. Proc. § 6-201 because the County carries out its governmental functions in Prince George's County and because Sparacino and Higgins are employed in Prince George's County, MD.

THE PARTIES

12. Plaintiff James E. Carpenter is an African-American man who has been employed by the PGCPD since January 22, 2007. He currently holds the rank of Corporal, and he resides within Prince George's County, Maryland.

13. Defendant Prince George's County is a municipal corporation duly organized and existing under the laws of the State of Maryland. Prince George's County is the proper party in suits to seek redress for wrongful acts committed by the PGCPD or its employees. The County is an "employer" within the meaning of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e(b), the Maryland Fair Employment Practices Act, Md. Code, State Gov't § 20-601(d), and the Prince George's County Code.

14. Defendant Paul Sparacino is a sergeant in the PGCPD, identified by badge number 3458. Sparacino served as Carpenter's immediate supervisor in the WAVE Auto Theft

Task Force from at least January 2023 through October 2024. Upon information and belief, Sparacino resides within Prince George's County, Maryland.

15. Defendant Jeffrey Higgins is a lieutenant in the PGCPD, identified by badge number 2762. Higgins served as the WAVE Auto Theft Task Force unit commander throughout the period relevant to this Complaint. Upon information and belief, Higgins resides within Queen Anne's County, Maryland.

ADMINISTRATIVE EXHAUSTION

16. On October 17, 2024, Carpenter filed a Charge of Discrimination with the EEOC, designated as EEOC Charge No. 12H-2025-00001, alleging retaliation. The charge was cross-filed with the Prince George's County Office of Human Rights as charge number OHR24-0902. The charge narrative identifies Carpenter's witness participation in his coworker's "racial harassment" complaint as the protected activity.

17. The EEOC issued a Notice of Right to Sue on February 19, 2026, which Carpenter received by electronic mail the same day.

18. Carpenter has satisfied all administrative prerequisites to filing this action.

BACKGROUND

18. Carpenter joined the PGCPD on January 22, 2007, as a Police Officer. In or about October 2013, Carpenter was promoted to the rank of Police Corporal. In or about September 2017, Carpenter was assigned to the Strategic Investigations Division as an Investigator within the WAVE Auto Theft Task Force / Organized Crime Unit, where he has served continuously to the present day.

19. As an Investigator within the WAVE unit, Carpenter is responsible for the investigation of crimes against property, specifically auto theft, attempted auto theft, and related

offenses. His duties include conducting crime-scene investigations, cultivating and managing confidential informants, preparing search warrants and charging documents, court testimony, and providing assistance to other PGPD units, neighboring jurisdictions, and federal agencies.

20. Throughout his 19 years of service with PGCPD, Carpenter has had no sustained disciplinary action, no use-of-force violations, and no findings of professional misconduct.

21. Through the rating period ending January 22, 2022, Carpenter's annual Past Performance Appraisals consistently rated him at the "Outstanding" or "Exceeds Satisfactory" level. His 2021–2022 PPA carried a numerical rating of 3.85, which is at the high end of the "Outstanding" band.

22. The PGCPD Internal Affairs Division confirmed Carpenter's eligibility for the Good Conduct Award for the rating periods January 22, 2022 through January 22, 2023 and January 22, 2023 through January 22, 2024.

The WAVE Unit, Sparacino, and Higgins

23. The WAVE Auto Theft Task Force / Organized Crime Unit operates within PGCPD's Strategic Investigations Division, with offices located at 8803 Police Plaza, 2nd Floor, Upper Marlboro, Maryland.

24. The WAVE Auto Theft Task Force is comprised of two squads: an Organized Crime Squad supervised by Sergeant Paul Sparacino, who is Caucasian, and a Street Squad supervised by Sergeant Tariq Hall, who is African-American. Lieutenant Jeffrey Higgins, who is Caucasian, is the WAVE unit commander.

25. Hall was the most senior sergeant in WAVE and had served in the unit since 2019; Sparacino and Higgins each joined WAVE in late 2021. Up until October 2024, Sparacino

served as Carpenter's first-line supervisor, and Higgins served as Carpenter's second-line supervisor throughout the period relevant to this Complaint.

26. During the period from January 2023 through the present, the Organized Crime Squad has consisted of Carpenter (African-American), Corporal Brandon Flax (African-American), Corporal Damian Lee (African-American), Detective Tyree Clark of the Anne Arundel County Police Department (African-American), Maryland State Police Trooper Tanya Wingfield (African-American), Corporal David Gross (Caucasian), and Detective Brendan Stokes (Caucasian). The Street Squad has consisted of Detective Donnell Thomas (African-American), Detective Channing Reed (African-American), Detective Frankie Perrus (Caucasian), Detective Jason Jones (Caucasian), Detective Michael Myerly (Caucasian), and Detective Walter Calhoun (Caucasian).

27. Higgins maintained a personal relationship with Stokes that extended outside the workplace. Stokes's brother coached Higgins's children's youth baseball team in Queen Anne's County, Maryland, and Stokes's children and Higgins's children played in the same youth baseball league.

***Carpenter's First Protected Activity:
The November 2022 Squad Meeting and the 2022–2023 PPA Rebuttal***

28. On or about November 14, 2022, Carpenter raised concerns in a WAVE Squad meeting regarding the quality of supervision the squad was receiving from Sparacino and Higgins. Carpenter's concerns included the supervisors' inattention to ongoing investigations, their failure to respond to unit callouts, and their differential treatment of Black officers within the squad.

29. On November 15, 2022, immediately following a routine squad meeting, Sparacino directed Carpenter to remain after the other squad members had departed. During that

meeting, Sparacino did not identify any specific deficiency in Carpenter’s investigative work and did not provide Carpenter with a written Performance Assessment Form, memorandum, or other document indicating that Carpenter’s performance was unsatisfactory or that disciplinary action of any kind was contemplated.

30. The PGCPD General Order Manual, Volume I, Chapter 28 (“Performance Appraisal”), § 7 (“Employee Counseling”), in effect on November 15, 2022, requires that “[w]henever a supervisor deems an employee’s overall performance unsatisfactory, the supervisor shall advise the employee in writing via a Performance Assessment Form or memorandum,” and that “[w]henever possible, the notification shall be provided to the employee no less than 90 days before the end of the current rating period.” Sparacino’s conduct on November 15, 2022 violated this provision of the General Order Manual.

31. On or about February 22, 2023, Carpenter discussed his concerns about Sparacino’s and Higgins’s treatment of Black officers in the WAVE unit with retired Deputy Chief Felipe Ordono. Deputy Chief Ordono confirmed his awareness of the concerns and undertook to address them informally with Carpenter’s chain of command.

32. Carpenter’s rating period ended on January 22, 2023. The PGCPD General Order Manual, Volume I, Chapter 28, § 1 (“Anniversary Appraisal”), requires that supervisors “prepare a PPA at least ten (10) days before the rated employee[‘s . . . anniversary date.”

33. Sparacino did not deliver Carpenter’s 2022–2023 PPA to him until March 15, 2023, which was 52 days after Carpenter’s January 22, 2023 work anniversary date and 62 days after the General Order deadline.

34. In the 2022–2023 PPA, Sparacino assigned Carpenter a “Needs Improvement” rating in Investigations (a numerical rating of “1” out of 4), the lowest score available short of

“Unsatisfactory.” Sparacino also assigned Carpenter “Satisfactory” ratings in Reports and Assists Other Sections / Jurisdictions, contrasted against an “Outstanding” rating in Professional Development, Enforcement, Court, and Other Assignments. The overall numerical rating was 2.80 in the “Exceeds Satisfactory” band, which was a substantial drop from Carpenter’s prior “Outstanding” rating of 3.85.

35. The 2022–2023 PPA contained a narrative justification for the “Needs Improvement” rating in Investigations that referenced unspecified performance concerns. Sparacino did not provide Carpenter with documentation supporting any of the narrative assertions, and the General Orders’ midpoint-counseling requirement had not been satisfied.

36. On March 23, 2023, Carpenter submitted to Sparacino a four-page rebuttal to the 2022–2023 PPA, accompanied by approximately 35 pages of supporting documentary evidence. In the rebuttal, Carpenter: (a) protested the unsupported “Needs Improvement” rating in Investigations and the procedural violations of Chapter 28, § 7 of the General Orders; (b) identified Detective Stokes as a Caucasian comparator who received favorable treatment despite policy violations; (c) cited statistical investigative production figures supporting his work; and (d) protested the differential treatment of Black officers in the WAVE unit. The supporting documents Carpenter attached included, among other things, an email from Higgins that contradicted the narrative justifications in the PPA and an email from the FBI Washington Field Office reflecting the value of Carpenter’s federal task-force work.

Sparacino’s Five-Page Supervisor Rebuttal Inserted Without Notice

37. On March 28, 2023, Sparacino added a five-page supervisor rebuttal to Carpenter’s personnel file. The five-page rebuttal contained negative commentary on Carpenter’s work habits, productivity, attendance, and character.

38. Sparacino did not provide Carpenter with a copy of the five-page rebuttal at the time it was added to the personnel file. Sparacino did not discuss the rebuttal with Carpenter, did not solicit Carpenter's response, and did not obtain Carpenter's signature on any of the five pages. Carpenter had no knowledge of the rebuttal at the time it was added to his file.

39. The PGCPD General Order Manual, Volume I, Chapter 28, § 4, provides that "[a]ny changes that are made to the PPA must be discussed with the Employee." Sparacino's addition of the five-page rebuttal to Carpenter's personnel file violated Chapter 28, § 4 of the General Orders.

40. On April 5, 2023, Higgins issued a memorandum reviewing the 2022–2023 PPA and Carpenter's rebuttal. The April 5, 2023 memorandum did not address the documentary evidence Carpenter had attached to his rebuttal, did not address the procedural violations Carpenter had identified, and did not direct any corrective action regarding Sparacino's evaluation. Higgins ratified the 2.80 overall rating without further inquiry.

41. On April 24, 2023, Captain Dolihite, as appointing authority, signed off on the 2022–2023 PPA over Carpenter's written rebuttal and unaddressed objections.

Carpenter's Witness Participation in the Flax and Gross Charges

42. In or about November 2023, Corporal Brandon Flax filed a Charge of Discrimination with the EEOC against the PGCPD (Charge No. 531-2024-00462), alleging that Sparacino and Higgins had subjected Flax to race-based harassment and discrimination. Corporal Flax is African American, and at the time, he was an investigator within the WAVE unit and Carpenter's squad mate.

43. In or about July 2024, Corporal David Gross filed a Charge of Discrimination with the Prince George's County Office of Human Rights against the PGCPD (Charge No. 12H-

2024-00045), alleging race-based harassment and discrimination by Sparacino and Higgins. Gross is Caucasian and was, at the time, an investigator within the WAVE unit and a member of Carpenter's squad. Gross's charge identifies Flax, Hall, and Carpenter by name as the African-American officers Sparacino and Higgins were targeting.

44. Carpenter is identified by name as a participating witness in both the Flax and Gross EEOC charges.

45. Following the filing of the Flax and Gross charges, both Flax and Gross were transferred out of the WAVE Auto Theft Task Force back to patrol assignments.

46. On or about August 23, 2024, Sparacino became aware that Carpenter was a participating witness in the Flax and Gross charges.

The Discovery on August 23, 2024

47. After speaking with members of the PGCPD Psychological Services Division and with sworn PGCPD officers who advised that the circumstances surrounding the 2022–2023 PPA were suspicious, Carpenter contacted Human Resources Analyst Patricia Zulueta on August 23, 2024 and requested a copy of his 2022–2023 PPA from his official personnel file.

48. When Carpenter received the file copy from Zulueta on August 23, 2024, he discovered for the first time that: (a) Sparacino had inserted the five-page supervisor rebuttal described in paragraph 38 above into the personnel file; (b) Carpenter's signature did not appear on any of the five pages; and (c) the approximately 35 pages of supporting documentary evidence Carpenter had attached to his March 23, 2023 rebuttal, including the FBI Washington Field Office email and the Higgins email contradicting the narrative justifications in the PPA, had been removed from the rebuttal package and was not present in the personnel file.

49. Upon information and belief, the removal of Carpenter's supporting documentation from his rebuttal package and the unilateral insertion of Sparacino's five-page rebuttal occurred between March 23, 2023, and March 28, 2023.

50. In September 2024, after the discovery described in paragraph 49, Carpenter notified the FOP of the unauthorized five-page supervisor rebuttal that had been added to his personnel file on March 28, 2023. Sparacino's failure to provide Carpenter with contemporaneous notice of the five-page rebuttal deprived Carpenter of his ability to file a timely grievance regarding the rebuttal under the FOP grievance procedure.

The Loss of the IAATI Board Seat and the FBI Washington Field Office Deputization

51. From June 2022 through 2025, Carpenter served as an elected member of the Board of Directors of the Southeast Chapter of the International Association of Auto Theft Investigators ("IAATI"), a national professional association whose members include law enforcement officers, insurance investigators, and prosecutors specializing in vehicle-theft investigations. Carpenter's service on the Board provided him with professional training, professional contacts, and a position of recognition within the auto-theft investigative community.

52. In or around the second and third quarters of 2024, Higgins and Sparacino denied Carpenter's requests for training authorization and travel approval that would have permitted Carpenter to maintain his Board service. The training and travel requests Carpenter submitted were comparable to, and in some instances less burdensome than, the training and travel requests Higgins approved for Stokes.

53. As a direct consequence of the denials described in the preceding paragraph, Carpenter was unable to maintain the attendance and participation required to retain his seat on

the IAATI Southeast Chapter Board of Directors, and he lost the Board seat in or around August 2024.

54. From 2021 through October 2023, Carpenter served as a federally deputized Task Force Officer with the FBI Washington Field Office Safe Streets Task Force. The deputization authorized Carpenter to investigate federal offenses, conduct cross-jurisdictional operations, and access federal investigative resources. The FBI deputization required annual renewal in coordination with the supervising PGPD command.

55. In or around October 2023, Higgins and Sparacino did not support the renewal of Carpenter's federal deputization, and the deputization lapsed. The lapse of the FBI deputization removed Carpenter from a federal task-force assignment of professional and reputational significance and foreclosed Carpenter's continued participation in cross-jurisdictional federal investigations.

The Comparator: Detective Brendan Stokes

56. Detective Brendan Stokes is Caucasian, and he was, at all relevant times during the 2022, 2023, and 2024 rating cycles, an investigator within the WAVE Auto Theft Task Force. Stokes's first-line supervisor was Sparacino and his second-line supervisor was Higgins.

57. Stokes shared with Carpenter the same job title (Investigator), the same general assignment within the WAVE unit, the same first-line supervisor (Sparacino), the same second-line supervisor (Higgins), and the same applicable workplace policies and General Orders.

58. From January 2023 through August 2023, Stokes was placed on light-duty status following an on-duty injury. From November 2023 through January 2024, Stokes returned to light-duty status.

59. While on light-duty and no-duty status, Stokes was permitted by Higgins and Sparacino to: (a) earn overtime compensation; (b) operate a department vehicle to and from his residence located approximately one hour outside Prince George's County in Queen Anne's County, Maryland; (c) take police action and have contact with members of the public; and (d) leave work prior to the end of his scheduled tour of duty in order to attend evening youth-baseball games and practices in Queen Anne's County.

60. The PGCPD General Orders prohibit officers on light-duty or no-duty status from taking police action and from contacting members of the public in an enforcement capacity. The General Orders likewise govern overtime authorization and the use of department vehicles for personal travel.

61. Higgins and Sparacino were aware that Stokes had been violating the General Orders while on light-duty because Carpenter and Flax notified them of such. Neither Higgins nor Sparacino took any action against Stokes for violating the General Orders while on light-duty. On August 19, 2023, Carpenter raised concerns with Sparacino about the preferential treatment Stokes was receiving as compared to himself and Flax, and Carpenter commented that the preferential treatment appeared to be racially motivated.

62. Higgins and Sparacino did not document, counsel, or discipline Stokes for any of the conduct described in paragraphs 60 and 61, notwithstanding their knowledge that the conduct violated the General Orders.

63. During the same period, Higgins and Sparacino documented Carpenter on his 2022–2023 PPA for “often being late to work.” Sparacino did not produce any contemporaneous written record of Carpenter's tardiness to support the documentation, and the General Orders'

midpoint-counseling and written-notification requirements were not followed in connection with the tardiness allegation.

64. During the same period, Higgins approved Stokes's attendance at specialized training opportunities while Higgins and Sparacino denied Carpenter's requests for comparable training, with the consequence that Carpenter lost his elected seat on the IAATI Southeast Chapter Board of Directors.

65. Higgins and Sparacino also prohibited Carpenter earning overtime pay. Overtime requests are first sent to Sparacino, who then sends the requests to Higgins for approval. Prior to February 2023, Carpenter regularly requested overtime, and his requests were approved. Starting in February 2023, Sparacino began denying Carpenter's overtime requests. The requests were denied without any explanation. After Sparacino and Higgins were transferred in October 2024, Carpenter's overtime requests were approved.

The Targeting of Sergeant Tariq Hall

66. Sergeant Tariq Hall is an African-American supervisor who served within the WAVE unit's chain of command at all times relevant to this Complaint until his suspension as described below.

67. In or about September 2023, Sparacino and Higgins initiated an Internal Affairs investigation against Hall. The investigation included 20 separate departmental charges premised on allegations of theft and policy violations.

68. As a result of the Internal Affairs investigation, Hall was suspended departmentally for approximately 17 months.

69. In February 2025, Hall was exonerated on each of the 20 charges. The Internal Affairs investigation produced no sustained finding against Hall on any allegation.

70. During the pendency of the Hall investigation, Carpenter personally observed Sparacino and Higgins make false representations regarding Hall's work schedule that, if credited, would have supported a recommendation that Hall be terminated. The misrepresentations Carpenter observed were not credited by the independent investigative authority that ultimately exonerated Hall.

71. After Hall was exonerated on each of the 20 charges, he was transferred from the WAVE unit to a patrol assignment as a sergeant. The transferred occurred without any explanation and served as a demotion. Upon information and belief, Higgins caused Hall to be transferred out of the WAVE unit.

The 2023–2024 PPA and the Contradictory Award Nominations

72. On January 4, 2024, Sergeant Karrenton Savoy of the PGCPD Internal Affairs Division confirmed in writing to Sparacino that Carpenter was eligible for the Good Conduct Award for the rating period of January 22, 2023 to January 22, 2024.

73. On January 30, 2024, Sparacino executed a Prince George's County Government Employee Incentive Awards Program Nomination Award Form, recommending Carpenter for an Exemplary Performance Award based on Carpenter's "overall rating of 'Outstanding' on the past two consecutive annual PPAs," and certifying that Carpenter "ha[d] met ALL criteria required in the justification" for the award.

74. On the same date, January 30, 2024, Sparacino executed a separate Nomination Award Form recommending Carpenter for a Special Achievement Award based on Carpenter's "overall rating of 'Exceeds Satisfactory' or higher on the past two PPAs" and the absence of any sustained disciplinary actions within the past 24 months. Sparacino again certified by signature that Carpenter "ha[d] met ALL criteria required in the justification" for the award.

75. The two Nomination Award Forms Sparacino executed on January 30, 2024 covered, by their express terms, the same rating period for which Sparacino was concurrently preparing Carpenter's 2023–2024 PPA.

76. On February 12, 2024, Sparacino delivered the 2023–2024 PPA to Carpenter. The 2023–2024 PPA assigned Carpenter overall ratings of “Outstanding” or “Exceeds Satisfactory” in each of the seven task categories, including “Outstanding” in Investigations, and a numerical overall rating of 3.55 in the “Outstanding” band. The narrative supervisor assessment identified Carpenter's investigation of “a long-term investigation into a salvage and stolen vehicle operation located on Skyline Terrace” as one in which “over 90 vehicles were located on this residential property and over 30 of them were reported stolen and/or were considered VIN violations,” and it characterized the investigation as “among the largest recovery operations in recent years.”

77. The 2023–2024 PPA was delivered to Carpenter 21 days after his anniversary date of January 22, 2024, in violation of the General Order Manual, Volume I, Chapter 28, § 1.

78. At the conclusion of the meeting on February 12, 2024, during which Sparacino delivered the 2023–2024 PPA, Carpenter checked the single box on the Past Performance Appraisal Form indicating, “I agree with this appraisal.” Carpenter expressly declined to check the separate box stating, “I have reviewed my position description (PG544) and it is accurate and current,” and verbally informed Sparacino that he could not represent that the position description accurately reflected the way the WAVE unit operated under Higgins's and Sparacino's command. Carpenter signed the form below the single box he had checked.

79. Carpenter retained an original copy of the 2023–2024 PPA he signed on February 12, 2024. That retained original reflects only the single check mark Carpenter placed in the “I agree with this appraisal” box, with the position-description box left unmarked.

The September 10, 2024 Cherry-Picking Incident and the WAVE Chat Group

80. On September 10, 2024, Detective Damian Lee assisted Anne Arundel County detectives with the recovery of a stolen vehicle within Carpenter’s beat without notifying Carpenter. Carpenter sent a text in the WAVE chat group expressing concern about “cherry-picking” of straightforward case closures. The practice of “cherry-picking” refers to the redirection of straightforward case closures within Carpenter’s beat to other squad members in a manner that artificially depressed Carpenter’s apparent productivity.

81. Sparacino was a member of the WAVE Organized Crime chat group and received the chat-group notification of Carpenter’s message. Sparacino did not respond to Carpenter’s message and did not address the cherry-picking concern.

82. Carpenter informed Sparacino that he viewed this “cherry-picking” practice as another approach to target him for protesting the differential treatment towards Black officers within the WAVE unit, including the EEOC discrimination proceedings involving Flax and Gross.

83. In the days immediately following Carpenter’s September 10, 2024 chat-group message, Sparacino assigned Carpenter a volume of new cases substantially exceeding the volume Carpenter had received in the immediately preceding three months combined.

Carpenter’s October 17, 2024 EEOC Charge

84. On October 17, 2024, Carpenter filed a sworn Charge of Discrimination with the U.S. Equal Employment Opportunity Commission, EEOC Charge No. 12H-2025-00001,

alleging retaliation by the Prince George's County Police Department. The charge was cross-filed with the Prince George's County Office of Human Rights as charge number OHR24-0902.

85. In or about October 2024, immediately following the filing of Carpenter's EEOC charge, the County transferred Sparacino out of the WAVE Auto Theft Task Force and into the PGCPD Internal Affairs Division. The County also transferred Higgins out of the Wave unit around the same time.

86. The Internal Affairs Division is the PGCPD division responsible for investigating allegations of misconduct against PGCPD officers, including allegations involving violations of the General Order Manual provisions governing performance appraisals.

87. From October 2024 to the present, Sparacino has held an investigative assignment within the very PGCPD division that would, in the ordinary course, be responsible for investigating the policy violations Carpenter alleges Sparacino committed.

The December 30, 2024 Submission of the Altered PPA to the EEOC

88. On or about December 30, 2024, the County, through its Office of Law, submitted to the EEOC a position statement responding to Carpenter's Charge of Discrimination. The County's position statement attached, as Exhibit A, a purported copy of Carpenter's 2023–2024 PPA.

89. The version of the 2023–2024 PPA the County submitted to the EEOC as Exhibit A had been materially altered from the original document Carpenter signed on February 12, 2024. Specifically, the version submitted to the EEOC contained a check mark in the box stating, "I have reviewed my position description (PG544) and it is accurate and current." Carpenter expressly declined to mark this box in Sparacino's presence on February 12, 2024.

90. Carpenter's retained original copy of the 2023–2024 PPA does not contain a check mark in the position-description box. The retained original reflects only the single check mark Carpenter placed in the "I agree with this appraisal" box.

91. On January 14, 2025, the EEOC Baltimore Field Office contacted Carpenter regarding the County's December 30, 2024 position statement. Carpenter accessed his EEOC portal and reviewed the County's submission. Upon doing so, Carpenter discovered for the first time that Exhibit A to the County's position statement was a materially altered version of his 2023–2024 PPA.

92. The EEOC granted Carpenter an extension of time to respond to the County's December 30, 2024 position statement. Carpenter submitted a reply to the County's position statement that included side-by-side copies of (a) his retained original 2023–2024 PPA, reflecting the single check mark in the "I agree with this appraisal" box, and (b) Exhibit A to the County's position statement, reflecting the additional check mark in the position-description box that Carpenter had not placed.

93. The County did not respond to Carpenter's reply. The County did not retract the altered Exhibit A. The County did not amend its position statement. The County did not initiate an internal investigation of how the altered document came to be submitted to a federal civil rights agency.

94. The conduct described in paragraphs 88 and 89 constitutes a discrete adverse employment action with respect to Carpenter's employment, including but not limited to (a) the placement of the altered document in the County's official EEOC submission for the matter, where it would be reviewed by the federal civil rights agency adjudicating Carpenter's charge; (b) the implication, drawn from the altered document, that Carpenter had agreed to the accuracy

of his position description when in fact he had refused to do so; and (c) the placement of an altered document of disputed authenticity into the federal record of Carpenter's discrimination charge.

95. On May 2, 2025, after the discovery described in paragraphs 88 and 89 of the County's December 30, 2024 submission of the altered 2023–2024 PPA to the EEOC, Carpenter was permitted to file the FOP grievance out of time. The May 2, 2025 grievance protested, among other things, the procedural violations of the General Orders, the unauthorized addition of the five-page supervisor rebuttal to Carpenter's personnel file, and the differential treatment of Black officers in the WAVE unit.

96. In August 2025, the Prince George's County Office of the Chief sustained Carpenter's May 2, 2025 grievance.

97. Pursuant to the August 2025 grievance resolution, the County replaced the altered 2022–2023 and 2023–2024 PPAs in Carpenter's personnel file with revised appraisals. Each revised appraisal reflects an overall numerical rating of 3.85 in the "Outstanding" band, with task-by-task ratings of "Outstanding" or "Exceeds Satisfactory" in every category. The supervisor-assessment and supervisor-recommendation sections of each revised appraisal contain the express notation, "This section remains blank pursuant to a grievance resolution." The altered appraisals previously placed in Carpenter's personnel file by Sparacino were permanently removed, including the version of the 2023–2024 PPA the County had submitted to the EEOC on December 30, 2024 as Exhibit A to its position statement.

98. Notwithstanding the County's August 2025 grievance resolution and its administrative determination that the original 2022–2023 and 2023–2024 PPAs warranted permanent removal from Carpenter's personnel file, the County imposed no disciplinary action

on Sparacino or Higgins for the conduct underlying the resolution, including their procedural violations of Chapter 28 of the General Order Manual, the unauthorized addition of the five-page supervisor rebuttal to Carpenter's personnel file, the removal of Carpenter's supporting documentation from the rebuttal package, or the submission of the altered 2023–2024 PPA to a federal civil rights agency.

The Withholding of Backup Support and the Internal Affairs Complaint

99. Beginning in or around September 2023 and continuing through the present, members of the WAVE Organized Crime Squad operating under Sparacino's supervision and Higgins's command have repeatedly failed to provide Carpenter with backup support during high-risk operations, including operations involving armed-vehicle takedowns, suspect surveillance, and arrest activity.

100. The withholding of backup support has required Carpenter to seek out-of-jurisdiction assistance from officers, including Detective Joseph Pugliese of the Howard County Police Department, who has traveled into Prince George's County on multiple occasions to provide Carpenter with surveillance and operational support that the WAVE squad declined to provide.

101. The withholding of backup support has placed Carpenter at heightened personal-safety risk during enforcement activity. The conduct is observed and known to Sparacino as the immediate supervisor of the WAVE squad, and to Higgins as the unit commander.

102. Sparacino and Higgins have not corrected the withholding of backup support, have not directed squad members to provide backup support to Carpenter on equal terms, and have not memorialized the conduct in any disciplinary or counseling document.

The September 8, 2025 Internal Affairs Complaint

103. On September 8, 2025, approximately four months after submitting the May 2, 2025 FOP grievance, Carpenter filed a written Internal Affairs complaint identifying policy violations, document tampering, and retaliation by Sparacino and Higgins, and he requested that the matter be referred to an outside agency in light of Sparacino's October 2024 transfer into Internal Affairs.

104. Lieutenant Matthew Yelverton of the Internal Affairs Division acknowledged receipt of the complaint by email the same day. On October 20, 2025, after receiving no further communication, Carpenter emailed Lieutenant Yelverton and Captain Kyle Benson to inquire whether the matter had been outsourced or assigned to an Internal Affairs investigator.

Lieutenant Yelverton and Captain Benson are Sparacino's direct supervisors within Internal Affairs.

105. On October 22, 2025, Captain Benson and Lieutenant Sean McFarland conducted a recorded interview of Carpenter regarding the complaint. At the conclusion of the interview, Carpenter requested a copy of the recording for his own records. Captain Benson declined the request, advising that "only [his] attorney can request a copy." On November 17, 2025, Carpenter renewed the request for a copy of the recording by email to Captain Benson and Lieutenant McFarland; neither responded. The County has had no further communication with Carpenter regarding the September 8, 2025 Internal Affairs complaint since October 22, 2025.

Pattern Evidence and the County's Knowledge

106. In or about 2021, the County entered into a settlement with the Hispanic National Law Enforcement Association ("HNLEA") and several former employees, in connection with allegations of systemic race-based discrimination and retaliation within PGCPD (Case No. 8:18-

cv-03821). The settlement resolved claims that PGCPD had subjected officers of color to disparate treatment in promotions, assignments, performance evaluations, discipline, and other terms and conditions of employment, and obligated the County to undertake remedial measures designed to address the institutional patterns underlying the litigation. The aggregate settlement amount totaled approximately \$25 million, which was comprised of: (a) more than \$17 million paid in legal fees to Venable LLP, the private law firm that represented the County; (b) \$5 million paid in legal fees to the plaintiffs' attorneys; and (c) approximately \$2.3 million allocated amongst the individual and organizational plaintiffs.

107. The 2021 settlement placed the County on notice of an institutional pattern of race-based discrimination, retaliation, and disparate treatment within PGCPD, including patterns of disparate treatment in performance appraisals, training, overtime, and discipline of officers of color.

108. The conduct of Sparacino and Higgins toward Carpenter, Flax, Gross, and Hall is consistent with, and reflects, the institutional patterns identified in the 2021 settlement.

109. The County, acting through its final policymakers, has been on notice from at least 2021 that supervisors within PGCPD have engaged in race-based disparate treatment, retaliatory conduct, and the falsification of performance documentation against officers of color. Notwithstanding this notice, the County has failed to (a) implement supervisor-level training adequate to prevent the recurrence of such conduct; (b) implement audit or oversight mechanisms adequate to detect such conduct; (c) discipline supervisors who engage in such conduct; or (d) refer credible internal complaints of such conduct to unconflicted investigative authorities.

110. The County's continued failures described in the preceding paragraph reflect a deliberate indifference to the constitutional and statutory rights of African-American officers within PGCPD, including those belonging to Carpenter.

111. The County's failure to take any corrective action in response to Carpenter's May 2, 2025 FOP grievance, the County's failure to impose any discipline on Sparacino or Higgins notwithstanding the August 2025 grievance resolution sustaining Carpenter's claim that the original PPAs warranted permanent removal from his personnel file, and the County's failure for more than seven months to communicate with Carpenter about his September 8, 2025 Internal Affairs complaint following the October 22, 2025 interview, likewise reflect ratification of the underlying conduct, deliberate indifference to the rights of officers raising such complaints, and a custom of tolerating such conduct that has the force of policy.

Final Policymaker, Custom, and Ratification Allegations

112. Higgins, as the WAVE unit commander, exercised final review authority over the performance appraisals of officers under his command, including Carpenter's 2022–2023 and 2023–2024 PPAs. Higgins exercised that authority in his April 5, 2023 ratification memorandum and in his signed approval of the 2023–2024 PPA.

113. Captain Dolihite, as the appointing authority for the Strategic Investigations Division, exercised final approval authority over the PPAs of officers within the Division. Captain Dolihite signed the 2022–2023 PPA on April 24, 2023, after Carpenter's written rebuttal had been submitted, and signed the 2023–2024 PPA in February 2024.

114. The County's submission of the altered 2023–2024 PPA to the EEOC on December 30, 2024, through its Office of Law, and the County's failure to retract or correct the

submission after Carpenter put the County on notice of the alteration, constitutes ratification by the County of Sparacino's and Higgins's underlying conduct.

115. The conduct of Sparacino and Higgins toward Carpenter, taken together with: (a) the County's pattern of similar conduct against Flax, Gross, and Hall; (b) the institutional notice provided by the 2021 HNLEA settlement; (c) the County's failure to take remedial action in response to that notice; (d) the County's affirmative submission of an altered document to a federal civil rights agency; and (e) the County's continuing failure to investigate the September 8, 2025 Internal Affairs complaint, reflects an official policy, custom, and practice of the County, and was the moving force behind the constitutional and statutory deprivations Carpenter has suffered.

HARM CAUSED

116. As a direct and proximate result of Defendants' wrongful conduct, Carpenter has suffered and continues to suffer substantial harm.

117. Specifically, Carpenter has suffered economic harm, including but not limited to: (a) the denial of the Anniversary Merit Increase associated with the 2022–2023 rating period, the value of which compounds annually through the duration of his service; (b) the loss of overtime compensation Carpenter would have earned but for the supervisors' denial of overtime opportunities; (c) the loss of the value of professional training opportunities denied to him; (d) the loss of the federal task-force assignment with the FBI Washington Field Office and the professional development associated with it; (e) the loss of his ability to obtain timely contractual remedies under the FOP grievance procedure for the supervisors' procedural violations, occasioned by the supervisors' 17-month concealment of the unauthorized five-page rebuttal;

and (f) reduced future-earnings prospects arising from the artificially depressed 2022–2023 PPA, which remains a part of his official personnel record.

118. Carpenter has suffered substantial reputational harm. The artificially depressed 2022–2023 PPA, the unauthorized five-page supervisor rebuttal, and the altered 2023–2024 PPA submitted to the EEOC remain in his personnel file and his federal-agency records, where they may be reviewed by future employers, by federal agencies considering deputization, by promotion boards, and by other PGPD command staff.

119. Carpenter has suffered the loss of an elected position on the IAATI Southeast Chapter Board of Directors and the loss of his federal deputization with the FBI Washington Field Office Safe Streets Task Force, both of which were direct consequences of the supervisors' denial of training and renewal support and both of which represent identifiable terms and conditions of his employment with PGPD.

120. Carpenter has suffered substantial emotional and psychological harm, including depression, anxiety, and misplaced anger. On several occasions, Carpenter met with Sgt. Plumb in the Psychological Services Division to address the targeting, stress, and anxiety he was experiencing due to the actions taken by Sparacino and Higgins. Sgt. Plumb convinced Carpenter to seek therapy. Carpenter has been engaged in regular bi-weekly therapy sessions since September 2025 to address the psychological impact of the conduct alleged.

121. Carpenter has suffered an ongoing degradation of his personal-safety conditions at work. The withholding of backup support during high-risk operations places Carpenter at risk of physical harm, and the failure of his supervisors to correct the withholding has created an objectively dangerous workplace environment.

122. Carpenter has been forced to consider taking early retirement in lieu of continuing his career under the conditions the supervisors and the County have created.

123. The conduct of Sparacino and Higgins was undertaken willfully, with malice, and with reckless indifference to Carpenter's federally and state-protected rights.

COUNT I
Unlawful Retaliation in violation of 42 U.S.C. § 1981, by and through 42 U.S.C. § 1983
(Against All Defendants)

124. Carpenter incorporates herein the allegations set forth in paragraphs 1 through 123.

125. Section 1 of the Civil Rights Act of 1866, codified as 42 U.S.C. § 1981 ("Section 1981"), prohibits retaliation in the employment relationship against employees who oppose race-based conduct or participate in proceedings to enforce rights guaranteed by Section 1981.

126. At all times relevant to this Complaint, Sparacino and Higgins acted under color of state law when engaging in the challenged actions set forth herein.

127. Carpenter engaged in protected activity within the meaning of Section 1981 on multiple occasions, including by: (a) raising concerns at the November 14, 2022 WAVE squad meeting regarding the supervisors' differential treatment of Black officers in the unit; (b) submitting his March 23, 2023 written rebuttal opposing the differential treatment of Black officers in the WAVE unit; (c) discussing his concerns about the differential treatment of Black officers with Deputy Chief Felipe Ordonez in February 2023; (d) serving as a participating witness in the Flax and Gross EEOC charges, which alleged race-based discrimination; (e) filing his own EEOC charge on October 17, 2024, alleging retaliation by the PGCPD; (f) filing the May 2, 2025 grievance with FOP; (g) filing his September 8, 2025 Internal Affairs complaint; and (h) submitting his EEOC reply identifying the County's submission of an altered document.

128. Each of the activities described in the preceding paragraph constitutes either opposition to practices Carpenter reasonably believed to violate Section 1981 or participation as a witness in proceedings to enforce Section 1981, and each constitutes protected activity within the meaning of the statute.

129. Sparacino and Higgins were aware of each of the protected activities described in paragraph 127 at or around the time the activity occurred. Sparacino received Carpenter's March 23, 2023 written rebuttal as the supervisor responsible for the underlying PPA. Higgins reviewed and ratified the PPA over Carpenter's rebuttal in his April 5, 2023 memorandum. Both Sparacino and Higgins were named in the Flax and Gross charges and were, on information and belief, advised of Carpenter's witness participation. Sparacino and Higgins were on notice of Carpenter's September 2024 FOP notification, his May 2, 2025 FOP grievance, and his September 8, 2025 Internal Affairs complaint through the regular operations of the County's grievance and Internal Affairs intake processes, and through Sparacino's October 2024 reassignment into the Internal Affairs Division.

130. The County was aware of each of the protected activities described in paragraph 127 through its receipt of the EEOC charges and the Internal Affairs complaint, through its administration of the personnel file in which the rebuttal was filed, and through its participation in the EEOC proceedings, including through the December 30, 2024 position statement submitted by its Office of Law.

131. Following the protected activity, Defendants took adverse actions against Carpenter, including: (a) the issuance, on March 15, 2023, of the 2022–2023 PPA that lowered Carpenter's overall numerical rating from 3.85 to 2.80 and assigned him a "Needs Improvement" rating in Investigations, with the consequence of denying him the Anniversary Merit Increase

associated with that rating period; (b) the unilateral insertion, on or about March 28, 2023, of an unauthorized five-page negative supervisor rebuttal into Carpenter's personnel file, without notice or opportunity to respond, in violation of Chapter 28, § 4 of the General Order Manual; (c) the supervisors' concealment of that rebuttal from Carpenter for 17 months, which deprived him of his ability to file a timely FOP grievance; (d) the removal of Carpenter's supporting evidence from his rebuttal package; (e) the denial, in or about October 2023, of support for the renewal of Carpenter's federal deputization with the FBI Washington Field Office Safe Streets Task Force, with the consequence of the lapse of that deputization; (f) the denial of training requested by Carpenter that resulted in the loss of the IAATI Board seat; (g) the redirection of straightforward case closures within Carpenter's beat to other squad members, including the September 10, 2024 redirection of the stolen-vehicle recovery in Police District II to Detective Lee, with the cumulative effect of artificially depressing Carpenter's apparent productivity; (h) the denial of overtime opportunities throughout the period from June 2024 forward; (i) the withholding of backup support by squad members during high-risk enforcement operations, conducted with Sparacino's knowledge and Higgins's acquiescence; (j) the December 30, 2024 submission of the altered 2023–2024 PPA to the EEOC; (k) the County's failure to retract the submission after being put on notice of the alteration; (l) the County's failure to take any corrective action in response to Carpenter's May 2, 2025 FOP grievance; and (m) the County's continuing failure to investigate Carpenter's September 8, 2025 Internal Affairs complaint.

132. Each action set forth above constitute a materially adverse action under 42 U.S.C. § 1981 because each action would have dissuaded a reasonable worker in Carpenter's position from making or supporting a charge of race-based discrimination.

133. But for Carpenter engaging in the protected activity referenced in paragraph 127, the adverse actions would not have occurred. The temporal proximity, the procedural violations of the General Orders, the disparate treatment of Stokes, the contradictory award nominations Sparacino executed on January 30, 2024, and the pattern of similar conduct against Flax, Gross, and Hall, taken together, establish but-for causation.

134. The procedural violations of the General Order Manual identified above constitute deviations from the County's standard procedures that further support the inference of pretext and retaliation. The August 2025 grievance resolution further demonstrates that the original appraisals were not based on legitimate, nondiscriminatory performance concerns.

135. The conduct of Sparacino and Higgins toward Carpenter constitutes the official policy and custom of the County for the reasons set forth in paragraphs 106 through 115, incorporated herein.

136. The conduct of Sparacino and Higgins was willful, malicious, and undertaken with reckless indifference to Carpenter's federally protected rights, supporting an award of punitive damages against each of them.

137. The County's continuing failure to investigate Carpenter's September 8, 2025 Internal Affairs complaint reflects the County's deliberate indifference to credible reports of race-based retaliation by its supervisors, and constitutes a custom of tolerating such conduct that has the force of policy.

COUNT II
Unlawful Retaliation in Violation of Title VII of the Civil Rights Act of 1964
(Against the County)

138. Carpenter incorporates herein the allegations set forth in paragraphs 1 through 123.

139. Title VII of the Civil Rights Act of 1964, as amended, prohibits employers from retaliating against employees who engage in certain protected activities, which include opposing unlawful discriminatory practices, making a complaint of discrimination whether through formal or informal channels, or participating in proceedings related to complaints of discrimination based on race, color, religion, sex, or national origin.

140. The allegations set forth in paragraphs 127 through 136, incorporated herein, establish that Defendants unlawfully retaliated against Carpenter, in violation of Title VII, and in doing so, actually and proximately caused Carpenter substantial harm for which he is entitled to compensation.

141. For purposes of Title VII, the County is liable for harm caused to Carpenter by the unlawful retaliatory actions carried out by Sparacino and Higgins.

COUNT III
**Unlawful Retaliation in Violation of Maryland Fair Employment Practices Act
(Against the County)**

142. Carpenter incorporates herein the allegations set forth in paragraphs 1 through 123.

143. The Maryland Fair Employment Practices Act (“MFEP A”) makes it unlawful for an employer to “discriminate or retaliate against any person because the person has opposed any practice prohibited by [MFEP A], made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under [MFEP A], or exercised or enjoyed any right granted or protected by [MFEP A].” Md. Code, State Gov’t § 20-606(f).

144. The allegations set forth in paragraphs 127 through 136, incorporated herein, establish that the County, through the conduct of Sparacino and Higgins, unlawfully retaliated

against Carpenter in violation of MFEPA, and in doing so, actually and proximately caused Carpenter substantial harm for which he is entitled to compensation.

145. For purposes of the MFEPA, the County is liable for harm caused to Carpenter by the unlawful retaliatory actions carried out by Sparacino and Higgins.

COUNT IV
**Unlawful Retaliation in Violation of Prince George's County Code
(Against the County)**

146. Carpenter incorporates herein the allegations set forth in paragraphs 1 through 123.

147. The Prince George's County Code, Subtitle 2, Division 12, prohibits retaliation against any individual because the individual has opposed practices prohibited by the County Code or has participated in proceedings under the County Code, and authorizes a private civil action for violations under Md. Code, State Gov't § 20-1202.

148. The County Code's anti-retaliation provisions are interpreted in pari materia with MFEPA and Title VII.

149. The same factual allegations set forth in paragraphs 127 through 136, incorporated herein, establish that Defendants unlawfully retaliated against Carpenter, in violation of PGC Code § 2-209, and in doing so, actually and proximately caused Carpenter substantial harm for which he is entitled to compensation.

150. For purposes of the County Code, the County is liable for harm caused to Carpenter by the unlawful retaliatory actions carried out by Sparacino and Higgins.

COUNT V
Retaliatory Hostile Work Environment in Violation of 42 U.S.C. § 1981,
by and through 42 U.S.C. § 1983
(Against All Defendants)

151. Carpenter incorporates herein the allegations set forth in paragraphs 1 through 123.

152. Section 1981 prohibits employers from subjecting employees to a retaliatory hostile work environment in which unwelcome conduct is sufficiently severe or pervasive to alter the conditions of employment and that which is motivated by retaliatory animus arising from the employee's protected activity.

153. The protected activity identified in paragraph 127, incorporated herein, also constituted protected activity for purposes of Carpenter's retaliatory hostile work environment under Section 1981.

154. Following the protected activity, Defendants took adverse actions against Carpenter as identified in paragraph 131, incorporated herein. The cumulative course of conduct identified in paragraph 131, sustained over approximately three years, would have dissuaded a reasonable worker in Carpenter's position from making or supporting a charge of discrimination, and the totality of the conduct was sufficiently severe or pervasive to alter the conditions of Carpenter's employment.

155. The conduct identified in paragraph 131 was motivated by retaliatory animus arising from Carpenter's protected activity. Each act in the course of conduct followed an instance of protected activity by Carpenter, and the temporal sequence—together with the contradictory award nominations, the procedural violations of the General Orders, the disparate treatment of Detective Stokes, and the pattern of similar conduct against Flax, Gross, and Hall—

supports the inference that the conduct was undertaken because of Carpenter's protected activity rather than for any legitimate work-related reason.

156. The conduct of Sparacino and Higgins toward Carpenter constitutes the official policy and custom of the County for the reasons set forth in paragraphs 106 through 115, incorporated herein.

157. The conduct of Sparacino and Higgins was willful, malicious, and undertaken with reckless indifference to Carpenter's federally protected rights, supporting an award of punitive damages against each of them.

COUNT VI
Retaliatory Hostile Work Environment in Violation of Title VII
(Against the County)

158. Carpenter incorporates herein the allegations set forth in paragraphs 1 through 123.

159. Title VII prohibits employers from subjecting employees to a retaliatory hostile work environment in which unwelcome conduct is sufficiently severe or pervasive to alter the conditions of employment and is motivated by retaliatory animus arising from the employee's protected activity.

160. The allegations set forth in paragraphs 153 through 156, incorporated herein, establish that Defendants subjected Carpenter to an unlawful retaliatory hostile work environment, in violation of Title VII, and in doing so, actually and proximately caused Carpenter substantial harm for which he is entitled to compensation.

161. For purposes of Title VII, the County is liable for harm caused to Carpenter by the unlawful retaliatory hostile work environment created by Sparacino and Higgins.

COUNT VII
Retaliatory Hostile Work Environment in Violation of the MFEPA
(Against the County)

115. Carpenter incorporates herein the allegations set forth in paragraphs 1 through 123.

116. The MFEPA prohibits employers from subjecting employees to a retaliatory hostile work environment in which unwelcome conduct is sufficiently severe or pervasive to alter the conditions of employment and is motivated by retaliatory animus arising from the employee's protected activity.

117. The allegations set forth in paragraphs 153 through 156, incorporated herein, establish that Defendants subjected Carpenter to an unlawful retaliatory hostile work environment, in violation of the MFEPA, and in doing so, actually and proximately caused Carpenter substantial harm for which he is entitled to compensation.

118. For purposes of the MFEPA, the County is liable for harm caused to Carpenter by the unlawful retaliatory hostile work environment created by Sparacino and Higgins.

COUNT VIII
Retaliatory Hostile Work Environment in Violation of the County Code
(Against the County)

119. Carpenter incorporates herein the allegations set forth in paragraphs 1 through 123.

120. The Prince George's County Code prohibits employers from subjecting employees to a retaliatory hostile work environment in which unwelcome conduct is sufficiently severe or pervasive to alter the conditions of employment and is motivated by retaliatory animus arising from the employee's protected activity.

121. The allegations set forth in paragraphs 153 through 156, incorporated herein, establish that Defendants subjected Carpenter to an unlawful retaliatory hostile work environment, in violation of the Prince George's County Code, and in doing so, actually and proximately caused Carpenter substantial harm for which he is entitled to compensation.

122. For purposes of PGC Code, the County is liable for harm caused to Carpenter by the unlawful retaliatory hostile work environment created by Sparacino and Higgins.

PRAYER FOR RELIEF

Plaintiff James E. Carpenter respectfully requests that this Court enter judgment on this Complaint, and in his favor and against Defendants, as follows:

A. Declare that Defendants' conduct violated 42 U.S.C. § 1981, Title VII of the Civil Rights Act of 1964, the Maryland Fair Employment Practices Act, and the Prince George's County Code;

B. Award Carpenter back pay, in a fair and reasonable amount to be determined at trial;

C. Award Carpenter front pay, in a fair and reasonable amount to be determined at trial;

D. Award Carpenter compensatory damages for the harm he suffered and continues to suffer as a result of Defendants' wrongful conduct, in a fair and reasonable amount to be determined at trial;

E. Award Carpenter punitive damages against Sparacino and Higgins, in an amount that sufficiently punishes, penalizes, and/or deters their unlawful conduct;

F. Order the County to expunge from Carpenter's personnel file the 2022–2023 PPA dated March 15, 2023, the unauthorized five-page supervisor rebuttal placed in the file on March

28, 2023, and to confirm that the altered 2022–2023 and 2023–2024 PPAs have been permanently removed from Carpenter’s personnel file consistent with the August 2025 grievance resolution;

G. Order the County to retract its December 30, 2024 submission of the altered 2023–2024 PPA to the EEOC and to correct the federal record;

H. Order the County to take such steps as are necessary to restore Carpenter’s federal deputization with the FBI Washington Field Office, or to provide an equivalent federal task-force assignment;

I. Order the County to authorize Carpenter’s training and travel sufficient to permit him to seek restoration of his elected position on the IAATI Southeast Chapter Board of Directors or an equivalent professional position;

J. Order the County to refer Carpenter’s September 8, 2025 Internal Affairs complaint to an unconflicted external investigative authority for prompt and substantive investigation, with reporting to Carpenter and to this Court;

K. Award Carpenter the costs and fees he has incurred in connection with this action, including reasonable attorney fees; and

L. Grant Carpenter such other relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

In accordance with Maryland Rule 2-325(a), Carpenter hereby elects a trial by jury on all issues herein triable of right by a jury.

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Dated: May 12, 2026

/s/ Jordan D. Howlette

JORDAN D. HOWLETTE

MD AIS No.: 2006110003

Managing Attorney

Justly Prudent

16701 Melford Blvd., Suite 400

Bowie, MD 20715

Tel: (202) 921-6005

Fax: (202) 921-7102

jordan@justlyprudent.com

Counsel for Plaintiff

CIVIL – NON-DOMESTIC CASE INFORMATION REPORT

DIRECTIONS

Plaintiff: This Information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Justice of the Supreme Court of Maryland pursuant to Rule 2-111(a).

Defendant: You must file an Information Report as required by Rule 2-323(h).

THIS INFORMATION REPORT CANNOT BE ACCEPTED AS A PLEADING

FORM FILED BY: [X] PLAINTIFF [] DEFENDANT

CASE NUMBER C-16-CV-26-002878

CASE NAME: James Carpenter

vs. Prince George's County, et al.

Plaintiff

(Clerk to insert) Defendant

PARTY'S NAME:

PHONE:

PARTY'S ADDRESS:

PARTY'S E-MAIL:

If represented by an attorney:

PARTY'S ATTORNEY'S NAME: Jordan Howlette

PHONE: (202) 921-6005

PARTY'S ATTORNEY'S ADDRESS: 16701 Melford Blvd., Suite 400, Bowie, Maryland 20715

PARTY'S ATTORNEY'S E-MAIL: jordan@justlyprudent.com

JURY DEMAND? [X] Yes [] No

RELATED CASE PENDING? [] Yes [X] No If yes, Case #(s), if known:

ANTICIPATED LENGTH OF TRIAL?: hours 5 days

PLEADING TYPE

New Case: [X] Original [] Administrative Appeal [] Appeal

Existing Case: [] Post-Judgment [] Amendment

If filing in an existing case, skip Case Category/Subcategory section – go to Relief section.

IF NEW CASE: CASE CATEGORY/SUBCATEGORY (Check one box.)

TORTS

- [] Asbestos
[] Assault and Battery
[] Business and Commercial
[] Child Victims Act
[] Conspiracy
[] Conversion
[] Defamation
[] False Arrest/Imprisonment
[] Fraud
[] Lead Paint – DOB of Youngest Plt:
[] Loss of Consortium
[] Malicious Prosecution
[] Malpractice-Medical
[] Malpractice-Professional
[] Misrepresentation
[] Motor Tort
[] Negligence
[] Nuisance
[] Premises Liability
[] Product Liability
[] Specific Performance
[] Toxic Tort
[] Trespass
[] Wrongful Death

CONTRACT

- [] Asbestos
[] Breach
[] Business and Commercial
[] Confessed Judgment (Cont'd)
[] Construction
[] Debt

- [] Fraud
[] Government
[] Insurance
[] Product Liability
PROPERTY
[] Adverse Possession
[] Breach of Lease
[] Detinue
[] Distress/Distrain
[] Ejectment
[] Forcible Entry/Detainer
[] Foreclosure

- [] Commercial
[] Residential
[] Currency or Vehicle
[] Deed of Trust
[] Land Installments
[] Lien
[] Mortgage
[] Right of Redemption
[] Statement Condo
[] Forfeiture of Property/ Personal Item
[] Fraudulent Conveyance
[] Landlord-Tenant
[] Lis Pendens
[] Mechanic's Lien
[] Ownership
[] Partition/Sale in Lieu
[] Quiet Title
[] Rent Escrow
[] Return of Seized Property
[] Right of Redemption
[] Tenant Holding Over

PUBLIC LAW

- [] Attorney Grievance
[] Bond Forfeiture Remission
[] Civil Rights
[] County/Mncpl Code/Ord
[] Election Law
[] Eminent Domain/Condemn.
[] Environment
[] Error Coram Nobis
[] Habeas Corpus
[] Mandamus
[] Prisoner Rights
[] Public Info. Act Records
[] Quarantine/Isolation
[] Writ of Certiorari

EMPLOYMENT

- [] ADA
[] Conspiracy
[X] EEO/HR
[] FLSA
[] FMLA
[] Worker's Compensation
[] Wrongful Termination

INDEPENDENT PROCEEDINGS

- [] Assumption of Jurisdiction
[] Authorized Sale
[] Attorney Appointment
[] Body Attachment Issuance
[] Commission Issuance

- [] Constructive Trust
[] Contempt
[] Deposition Notice
[] Dist Ct Mtn Appeal
[] Financial
[] Grand Jury/Petit Jury
[] Miscellaneous
[] Perpetuate
[] Testimony/Evidence
[] Prod. of Documents Req.
[] Receivership
[] Sentence Transfer
[] Set Aside Deed
[] Special Adm. – Atty
[] Subpoena Issue/Quash
[] Trust Established
[] Trustee Substitution/Removal
[] Witness Appearance-Compel

PEACE ORDER

- [] Peace Order

EQUITY

- [] Declaratory Judgment
[] Equitable Relief
[] Injunctive Relief
[] Mandamus

OTHER

- [] Accounting
[] Friendly Suit
[] Grantor in Possession
[] Maryland Insurance Administration
[] Miscellaneous
[] Specific Transaction
[] Structured Settlements

IF NEW OR EXISTING CASE: RELIEF (Check All that Apply)

- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Abatement | <input type="checkbox"/> Earnings Withholding | <input type="checkbox"/> Judgment-Default | <input type="checkbox"/> Reinstatement of Employment |
| <input type="checkbox"/> Administrative Action | <input type="checkbox"/> Enrollment | <input type="checkbox"/> Judgment-Interest | <input type="checkbox"/> Return of Property |
| <input type="checkbox"/> Appointment of Receiver | <input type="checkbox"/> Expungement | <input type="checkbox"/> Judgment-Summary | <input type="checkbox"/> Sale of Property |
| <input type="checkbox"/> Arbitration | <input type="checkbox"/> Financial Exploitation | <input checked="" type="checkbox"/> Liability | <input type="checkbox"/> Specific Performance |
| <input type="checkbox"/> Asset Determination | <input type="checkbox"/> Findings of Fact | <input type="checkbox"/> Oral Examination | <input type="checkbox"/> Writ-Error Coram Nobis |
| <input type="checkbox"/> Attachment b/f Judgment | <input type="checkbox"/> Foreclosure | <input type="checkbox"/> Order | <input type="checkbox"/> Writ-Execution |
| <input type="checkbox"/> Cease & Desist Order | <input checked="" type="checkbox"/> Injunction | <input type="checkbox"/> Ownership of Property | <input type="checkbox"/> Writ-Garnish Property |
| <input type="checkbox"/> Condemn Bldg | <input type="checkbox"/> Judgment-Affidavit | <input type="checkbox"/> Partition of Property | <input type="checkbox"/> Writ-Garnish Wages |
| <input type="checkbox"/> Contempt | <input type="checkbox"/> Judgment-Attorney Fees | <input type="checkbox"/> Peace Order | <input type="checkbox"/> Writ-Habeas Corpus |
| <input checked="" type="checkbox"/> Court Costs/Fees | <input type="checkbox"/> Judgment-Confessed | <input type="checkbox"/> Possession | <input type="checkbox"/> Writ-Mandamus |
| <input checked="" type="checkbox"/> Damages-Compensatory | <input type="checkbox"/> Judgment-Consent | <input type="checkbox"/> Production of Records | <input type="checkbox"/> Writ-Possession |
| <input checked="" type="checkbox"/> Damages-Punitive | <input type="checkbox"/> Judgment-Declaratory | <input type="checkbox"/> Quarantine/Isolation Order | |

If you indicated **Liability** above, mark one of the following. This information is not an admission and may not be used for any purpose other than Track Assignment.

- Liability is conceded. Liability is not conceded, but is not seriously in dispute. Liability is seriously in dispute.

MONETARY DAMAGES (Do not include Attorney's Fees, Interest, or Court Costs)

- Under \$10,000 \$10,000 - \$30,000 \$30,000 - \$100,000 Over \$100,000

- Medical Bills \$ _____ Wage Loss \$ _____ Property Damages \$ _____

ALTERNATIVE DISPUTE RESOLUTION INFORMATION

Is this case appropriate for referral to an ADR process under Md. Rule 17-101? (Check all that apply)

- | | |
|--|--|
| A. Mediation <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | C. Settlement Conference <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| B. Arbitration <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | D. Neutral Evaluation <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

SPECIAL REQUIREMENTS

- If a Spoken Language Interpreter is needed, **check here and attach form CC-DC-041**
- If you require an accommodation for a disability under the Americans with Disabilities Act, **check here and attach form CC-DC-049**

ESTIMATED LENGTH OF TRIAL

*With the exception of Baltimore County and Baltimore City, please fill in the estimated **LENGTH OF TRIAL**.*

(Case will be tracked accordingly)

- | | |
|---|--|
| <input type="checkbox"/> 1/2 day of trial or less | <input type="checkbox"/> 3 days of trial time |
| <input type="checkbox"/> 1 day of trial time | <input checked="" type="checkbox"/> More than 3 days of trial time |
| <input type="checkbox"/> 2 days of trial time | |

BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM

For all jurisdictions, if Business and Technology track designation under Md. Rule 16-308 is requested, attach a duplicate copy of complaint and check one of the tracks below.

- | | |
|---|---|
| <input type="checkbox"/> Expedited - Trial within 7 months of Defendant's response | <input type="checkbox"/> Standard - Trial within 18 months of Defendant's response |
|---|---|

EMERGENCY RELIEF REQUESTED

**COMPLEX SCIENCE AND/OR TECHNOLOGICAL CASE
MANAGEMENT PROGRAM (ASTAR)**

*FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO ASTAR RESOURCES JUDGES under
Md. Rule 16-302, attach a duplicate copy of complaint and check whether assignment to an ASTAR is requested.*

Expedited - Trial within 7 months of
Defendant's response

Standard - Trial within 18 months of
Defendant's response

**IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY OR BALTIMORE COUNTY,
PLEASE FILL OUT THE APPROPRIATE BOX BELOW.**

CIRCUIT COURT FOR BALTIMORE CITY (CHECK ONLY ONE)

- Expedited Trial 60 to 120 days from notice. Non-jury matters.
- Civil-Short Trial 210 days from first answer.
- Civil-Standard Trial 360 days from first answer.
- Custom Scheduling order entered by individual judge.
- Asbestos Special scheduling order.
- Lead Paint Fill in: Birth Date of youngest plaintiff _____ .
- Tax Sale Foreclosures Special scheduling order.
- Mortgage Foreclosures No scheduling order.

CIRCUIT COURT FOR BALTIMORE COUNTY

- Expedited
(Trial Date-90 days) Attachment Before Judgment, Declaratory Judgment (Simple),
Administrative Appeals, District Court Appeals and Jury Trial Prayers,
Guardianship, Injunction, Mandamus.
- Standard
(Trial Date-240 days) Condemnation, Confessed Judgments (Vacated), Contract, Employment Related
Cases, Fraud and Misrepresentation, International Tort, Motor Tort, Other
Personal Injury, Workers' Compensation Cases.
- Extended Standard
(Trial Date-345 days) Asbestos, Lender Liability, Professional Malpractice, Serious Motor Tort or
Personal Injury Cases (medical expenses and wage loss of \$100,000, expert and
out-of-state witnesses (parties), and trial of five or more days), State Insolvency.
- Complex
(Trial Date-450 days) Class Actions, Designated Toxic Tort, Major Construction Contracts, Major
Product Liabilities, Other Complex Cases.

May 12, 2026 _____
Date

16701 Melford Blvd., Suite 400 _____
Street Address

Bowie MD 20715 _____
City State Zip Code

Jordan D. Howlette 2006110003 _____
Signature of Attorney/Party Attorney Number

Jordan D. Howlette _____
Printed Name

jordan@justlyprudent.com _____
E-mail