

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

AISHA WALKER,
c/o Justly Prudent
16701 Melford Blvd., Suite 400
Bowie, Maryland 20715,

Case No. C-16-CV-26-002796

DEMAND FOR JURY TRIAL

Plaintiff,

v.

PRINCE GEORGE’S COUNTY, MARYLAND,
Serve By Private Process On:
c/o Office of Law
1301 McCormick Drive, Suite 4100
Largo, Maryland 20774

Defendant.

_____ /

COMPLAINT FOR UNLAWFUL EMPLOYMENT DISCRIMINATION

Plaintiff Aisha Walker, for her Complaint against Defendant Prince George’s County, Maryland (the “County”), states the following:

1. This action arises from the unlawful disability discrimination, failure to accommodate, retaliation, and hostile work environment that Walker endured during her employment with the Prince George’s County Department of Permitting, Inspections and Enforcement (“DPIE”).
2. Walker is a qualified individual with documented disabilities, including Graves’ disease (an autoimmune thyroid disorder), cervical and lumbar injuries sustained in a March 2024 motor vehicle accident, and recurrent major depressive disorder. From the outset of her employment in December 2023, Walker disclosed her autoimmune condition to the County and,

beginning in March 2024, submitted multiple written requests for reasonable accommodations supported by documentation from her treating healthcare providers.

3. The County did not provide a single accommodation Walker requested. It did not provide the sit-stand desk and ergonomic chair her healthcare providers recommended for her cervical and lumbar conditions. It did not transfer her to an open position in another department, despite Walker's qualifications and the multiple positions for which she applied. It did not permit telework during flare-ups of her autoimmune condition. The interactive process the County initiated in April 2024 was never completed.

4. The County's response to Walker's accommodation requests was not limited to inaction. After Walker submitted candid feedback on a 90-day onboarding survey in late March 2024 and began the accommodation process within the same timeframe, her first-line supervisor, Nicole Brooks, and her second-level supervisor, Yvette Gayles, subjected Walker to escalating workplace conduct that altered the conditions of her employment. Walker was the only employee in her unit required to submit detailed daily work logs. Her telephone calls were monitored back-to-back. She was denied access to the customer-tracking system used by her colleagues and was reprimanded for asking colleagues for assistance. She was repeatedly summoned to disciplinary-style meetings for conduct that drew no scrutiny when committed by her colleagues. Walker overheard Brooks remark to Human Resources Liaison Roxanne Rush, in substance, that "it should not take that long for her to heal from a car injury."

5. Walker reported the disability discrimination, the failure to accommodate, and the hostile work environment to the County's Human Resources office, including a written complaint submitted to Thelia Jones on July 23, 2024, and an earlier complaint submitted to Gayles in approximately June 2024. Approximately two weeks after Walker submitted the July

23, 2024 written complaint, the County placed her on administrative leave. Six days after that, the County terminated her employment. The County provided no contemporaneous written discipline, no performance improvement plan, and no formal warning at any point during Walker's tenure.

6. Walker brings this action under the Maryland Fair Employment Practices Act, Md. Code Ann., State Gov't § 20-601 *et seq.*, and Subtitle 2 of Division 12 of the Prince George's County Code, to recover the wages, benefits, and other relief to which she is entitled as a result of the County's unlawful conduct.

JURISDICTION AND VENUE

7. This Court has subject-matter jurisdiction over this action under Md. Code Ann., Cts. & Jud. Proc. § 1-501.

8. Venue is proper in this Court under Md. Code Ann., Cts. & Jud. Proc. § 6-201(a) because Defendant Prince George's County, Maryland is a body politic and corporate of the State of Maryland that carries on regular business in Prince George's County. Venue is also proper under Md. Code Ann., State Gov't § 20-1013(a)(3) and Section 2-222 of the Prince George's County Code because the unlawful employment practices alleged in this Complaint occurred in Prince George's County.

THE PARTIES

9. Plaintiff Aisha Walker was employed by the County as an Administrative Aide II in the IT Customer Service Division of DPIE from December 19, 2023 through August 9, 2024. She resides in Prince George's County, Maryland.

10. Defendant Prince George's County, Maryland is a body politic and corporate of the State of Maryland. The County operates the Department of Permitting, Inspections and

Enforcement, which administers the County's permitting, inspection, and enforcement functions. DPIE maintains its principal offices at 9400 Peppercorn Place, Suite 500, Largo, Maryland 20774, in Prince George's County.

11. At all times relevant to this Complaint, the County was an "employer" and Walker was an "employee" within the meaning of the Maryland Fair Employment Practices Act and the Prince George's County Code.

ADMINISTRATIVE EXHAUSTION

12. On or about August 20, 2024, Walker filed a Charge of Discrimination with the Prince George's County Office of Human Rights ("OHR"), designated as FEPA Charge No. OHR24-0808, alleging disability discrimination, failure to accommodate, retaliation, and hostile work environment by the County in violation of federal, state, and local law.

13. The OHR dual-filed Walker's Charge with the United States Equal Employment Opportunity Commission, designated as EEOC Charge No. 12H-2024-00044, pursuant to work-sharing agreements between the agencies.

14. On March 13, 2026, Walker filed an Amended Charge of Discrimination with the OHR, supplementing the factual allegations in her original Charge. The Amended Charge was accepted by the OHR.

15. On April 13, 2026, the OHR issued a Disposition/Substantial Weight Review Notice dismissing Walker's Charge. On April 16, 2026, the EEOC issued a Notice of Right to Sue terminating its processing of Walker's Charge.

16. Walker has satisfied all administrative prerequisites to filing this action, and this Complaint is timely filed within the applicable limitations periods for all claims asserted herein.

FACTUAL ALLEGATIONS

17. On December 19, 2023, the County hired Walker as an Administrative Aide II in DPIE's IT Customer Service Division, at an annual salary of \$60,000.

18. Walker was assigned to DPIE's offices at 9400 Peppercorn Place, Suite 500, Largo, Maryland 20774.

19. At all times relevant to this Complaint, Nicole Brooks served as a Customer Success Specialist within DPIE's IT Customer Service Division and was Walker's first-line supervisor. Yvette Gayles served as the Director of DPIE's IT Division and was Walker's second-level supervisor. Roxanne Rush served as DPIE's Human Resources Liaison and was responsible for processing accommodation requests under the Americans with Disabilities Act and analogous state and local law. Thelia Jones served as a Human Resources representative within DPIE and was responsible for receiving and processing complaints of discrimination.

20. Walker's position required her to respond to customer inquiries by telephone and email, provide information about DPIE's permitting and inspection processes, and perform other administrative functions in support of the IT Customer Service Division.

21. Walker performed the essential functions of her position throughout her employment with DPIE. Members of the public Walker served submitted positive feedback about her customer service, including written commendations through the County's customer-satisfaction survey process.

22. Walker received no formal written discipline, no performance improvement plan, and no documented warning at any point during her employment with DPIE.

Walker's Disabilities and Initial Disclosure

23. Walker is a qualified individual with a disability within the meaning of the Maryland Fair Employment Practices Act, Md. Code Ann., State Gov't § 20-601(b), and the Prince George's County Code based on her diagnosed: (a) Graves' disease, an autoimmune thyroid disorder; (b) cervical disc degeneration and lumbago with sciatica resulting from a March 17, 2024 motor vehicle accident; (c) paresthesia of the right arm; and (d) recurrent major depressive disorder. Each of these conditions substantially limits one or more major life activities, including concentrating, thinking, working, sleeping, sitting for prolonged periods, and the operation of Walker's endocrine system.

24. Walker's Graves' disease causes flare-ups marked by stress sensitivity, depression, difficulty concentrating, difficulty thinking, and difficulty working. The condition substantially limits the operation of Walker's endocrine system and limits Walker's ability to concentrate, think, and work during flare-ups.

25. Walker disclosed her Graves' disease diagnosis to DPIE during the application process for the Administrative Aide II position.

26. On March 17, 2024, while employed by DPIE, Walker was involved in a motor vehicle accident. Walker was treated at the United Medical Center emergency room for acute low back pain and whiplash injury to the neck.

27. As a result of the March 17, 2024 motor vehicle accident, Walker was diagnosed with cervical disc degeneration, lumbago with sciatica, and paresthesia of the right arm. These conditions substantially limit Walker's ability to sit for prolonged periods, walk, stand, sleep, concentrate, and perform manual tasks.

28. Following the March 17, 2024 motor vehicle accident, Walker received ongoing treatment, including physical therapy and chiropractic care, at Advantage Rehabilitation and Wellness Center from April 2024 through June 2024, and additional medical treatment from Courtni Guevara, PA-C, of Gerald Family Care, P.C.

The 90-Day Onboarding Survey

29. On or about March 26, 2024, Brooks asked Walker to complete a 90-day onboarding check-in survey.

30. On or about March 29, 2024, Walker submitted her completed survey responses. In her responses, Walker provided candid feedback about her onboarding experience. Walker stated that she sometimes felt as though she was bothering colleagues when she asked questions, and she offered constructive suggestions for improving departmental processes, including the creation of standardized email templates and more detailed departmental reference materials.

31. Before Walker submitted the 90-day survey, Walker had not received any criticism from Brooks or Gayles regarding the volume of her work product, her call or email handling times, or her customer-service performance.

32. After Walker submitted the 90-day survey, the tenor of Brooks's interactions with Walker changed. Brooks began summoning Walker to meetings with Brooks and Gayles, in which Walker was criticized for purportedly producing insufficient work and for purportedly handling calls and emails too slowly.

Walker's Accommodation Requests and the County's Response

33. On or about March 29, 2024, Rush sent Walker the County's ADA Reasonable Accommodation Request form and ADA Medical Questionnaire and instructed Walker to return the completed forms by April 4, 2024.

34. Walker timely submitted the completed forms with supporting medical documentation from her treating providers, including Courtni Guevara, PA-C, and Dr. Rashida Cohen of Advantage Rehabilitation and Wellness Center.

35. Walker's treating providers submitted multiple ADA Medical Questionnaires identifying Walker's diagnoses and recommending specific accommodations.

36. The accommodations Walker's treating providers recommended included: (a) a sit-stand desk and ergonomic chair to support Walker's lumbar spine; (b) the ability to move freely throughout the workday and to take breaks as needed; (c) transfer or reassignment to a light-duty position or to a different department to reduce stress that exacerbated both the autoimmune condition and the physical injuries; (d) telework during flare-ups of the autoimmune condition; and (e) leave of absence if accommodations could not be provided.

37. When Walker submitted her completed accommodation request forms, Walker asked Brooks whether to send the medical documentation directly to Human Resources or whether to copy her supervisors. Brooks instructed Walker to copy Brooks and Gayles on the email containing the medical documents.

38. Walker followed Brooks's instruction and copied Brooks and Gayles on the email transmitting the medical documentation. Brooks and Gayles thus had direct access to and knowledge of Walker's specific medical diagnoses, disability status, and the accommodations Walker's treating providers had recommended.

39. Rush subsequently scolded Walker for including supervisors on a communication containing sensitive medical information and informed Walker that such documentation should be shared only with Human Resources.

40. On or about April 18, 2024, Rush conducted an initial interactive engagement meeting with Walker. On or about June 3, 2024, Rush conducted a second meeting with Walker.

41. The County did not provide Walker any of the accommodations Walker's treating providers had recommended.

42. The County did not provide Walker a sit-stand desk or ergonomic chair. Rush instructed Walker to research options on her own, but the County took no further action.

43. The County did not transfer Walker to a different department or to a light-duty position. Walker submitted multiple internal applications for transfer, as set forth below, and was not selected for any position.

44. Rush rejected Walker's request for telework during flare-ups, stating that telework was not a reasonable accommodation under the Americans with Disabilities Act.

45. The County did not complete the interactive process initiated in April 2024. The County did not propose alternative accommodations and did not implement any accommodation before Walker's termination.

Walker's Internal Applications for Transfer

46. Beginning in March 2024, Walker submitted internal applications for multiple County positions for which she met the minimum qualifications.

47. On March 19, 2024, the County rejected Walker's application for the Administrative Specialist 1G position with the County's Office of Homeland Security.

48. On April 4, 2024, Walker emailed Rush requesting information about transferring to Administrative Assistant 4G and Victim Service Coordinator positions within the Prince George's County Police Department.

49. On April 11, 2024, the County confirmed receipt of Walker's application for the Administrative Assistant 4G position and referred the application to the Police Department.

50. On April 22, 2024, Walker emailed Rush about transferring to an Assistant Wireless Coordinator position. On May 7, 2024, the County confirmed receipt of Walker's application for that position and referred it to the Office of Information Technology.

51. The County did not select Walker for an interview for any of the positions for which she applied. The County did not transfer Walker to any alternative position.

The Toxic Work Environment

52. After Walker submitted the 90-day survey and began the accommodation process, Brooks and Gayles subjected Walker to workplace conduct that materially altered the conditions of her employment.

53. Walker was the only employee in her unit required to submit detailed daily work logs documenting all tasks performed each day, with timestamps. Gayles directed that Walker submit these logs.

54. Walker could hear her telephone calls being monitored back-to-back by Brooks. The monitoring caused Walker to experience panic and anxiety during calls.

55. When Walker sought guidance from Brooks, Brooks's demeanor toward Walker was dismissive. On at least one occasion, after Walker had been instructed to wait for Brooks's follow-up guidance and a substantial portion of the workday had passed without that follow-up, Walker briefly asked a colleague for assistance after confirming that the colleague was not actively occupied with work. Shortly thereafter, Brooks sent Walker an email (with Gayles copied) criticizing Walker for asking questions of coworkers and stating that Walker was bothering them. Walker subsequently confirmed with the colleague that the colleague had not

complained about assisting Walker. Brooks's actions reflected that Walker was discouraged from seeking help to improve her performance, even from colleagues who had not raised any concern about being asked..

56. Walker was denied access to the customer-tracking system used by her colleagues to manage call and email volume (the "CTS system"). During a meeting, Gayles initially suggested that Walker use the CTS system, and Walker agreed and expressed that the system would be helpful because it would objectively track her work and productivity. Brooks subsequently denied Walker access to the CTS system. Walker's colleagues were trained on the CTS system and were permitted to use it on a rotating weekly basis. Walker was permitted to use the system on only one occasion, months after her colleagues received the initial training. Brooks and Gayles then criticized Walker for purported deficiencies in the volume and tracking of her work, in an area in which Walker was denied the very tool that would have enabled her to track and improve her productivity.

57. Walker was permitted to participate in in-person, hands-on training in the permits office located downstairs from her work area on a limited number of occasions, approximately three to four times, while her colleagues received those hands-on training opportunities on a regular basis. Walker expressed to Brooks and Gayles that going downstairs for hands-on training would help her understand the application process and customer concerns, and Walker requested additional opportunities. Brooks denied those requests. On one occasion, a colleague offered to temporarily switch assignments with Walker so that Walker could gain additional practical experience while the colleague covered Walker's upstairs duties. When Walker presented that suggestion to Brooks, Brooks denied it..

58. Walker was not given the same telework opportunities provided to her coworkers. Telework was generally available to employees across the County, and the County permitted Walker's coworkers to telework. The County effectively denied Walker the ability to telework as an accommodation for her disabilities. The County informed Walker that flare-ups of her autoimmune condition and limitations arising from her motor vehicle accident injuries could not serve as a basis for an accommodation, while other employees were accommodated for their medical conditions.

59. Walker was repeatedly summoned to disciplinary-style meetings with Brooks and Gayles, despite the absence of any formal written discipline.

60. Walker overheard Brooks state to Rush, in substance, that "it should not take that long for her to heal from a car injury." Brooks made the statement in reference to Walker's recovery from the March 17, 2024 motor vehicle accident and the medical treatment Walker required for her cervical and lumbar injuries.

61. Walker was forced to begin treatment with a therapist to manage the stress and anxiety caused by the workplace conduct described in this section.

62. On or about June 15, 2024, Walker was diagnosed with recurrent major depressive disorder by her treating provider at Gerald Family Care, P.C. Walker's depression was caused and exacerbated by the workplace conditions described in this Complaint, and the condition substantially limits Walker's ability to concentrate, think, sleep, and work during episodes.

Walker's Internal Complaints of Discrimination

63. In or around June 2024, Walker submitted a complaint of discrimination to Gayles, the Director of DPIE's IT Division. Walker alleged, among other things, that her requests

for reasonable accommodations were being ignored and that she was being subjected to retaliatory treatment. After Walker submitted the complaint, Gayles did not schedule a meeting with Walker, did not engage Walker in any further discussion regarding the concerns Walker had raised, and did not undertake any further inquiry into Walker's complaint with Walker or with Brooks. Gayles's only response was a single email that did not address the substance of Walker's concerns.

64. Walker also raised concerns to Rush on multiple occasions about the workplace conditions described above, including the failure to accommodate Walker's disabilities, the heightened scrutiny, and the disparate treatment. Walker requested Rush's assistance in addressing those conditions, including by transferring Walker to a different department.

65. On July 23, 2024, Walker submitted a written complaint of discrimination, hostile work environment, and harassment to Thelia Jones, a Human Resources representative within DPIE. In the complaint, Walker detailed the conduct she had experienced since submitting the 90-day survey, the County's failure to accommodate her disabilities, the daily work-log requirement and other heightened scrutiny applied to her alone, and Walker's belief that Brooks was assembling a record to support Walker's termination.

66. The complaint Walker submitted to Jones on July 23, 2024 identified specific workplace conduct, specific dates, and specific actors, including Brooks and Gayles.

67. Walker had a reasonable, good-faith belief that the conduct she opposed in her complaints to Gayles, Rush, and Jones constituted unlawful disability discrimination, failure to accommodate, and hostile work environment.

68. Following Walker's submission of the July 23, 2024 written complaint to Jones, the substance of Walker's complaint was disclosed to Brooks. During a subsequent meeting

attended by Brooks, Walker, and approximately six of Walker's colleagues, Brooks referenced specific issues that Walker had raised in the confidential complaint to Jones.

Walker's Administrative Leave and Termination

69. On August 2, 2024, the County issued a Notice of Termination signed by Dawit Abraham, the Director of DPIE. The Notice informed Walker that her probationary employment would be terminated effective at the close of business on August 9, 2024 and that, effective immediately, Walker would be placed on administrative leave for five business days.

70. The Notice of Termination was issued ten days after Walker submitted her July 23, 2024 written complaint of discrimination to Jones.

71. The Notice of Termination stated that the termination was the result of Walker's purportedly "unsatisfactory performance during the probationary period of December 18, 2023 through August 2, 2024."

72. The Notice of Termination identified three asserted performance deficiencies. The first being that Walker purportedly had "significant challenges in determining relevant information" needed by DPIE customers. The second being that Walker had purportedly "continuously failed to meet assignment deadlines." And the third being that Walker was purportedly "not able to perform the primary functions of this position independently."

73. The Notice of Termination did not reference any contemporaneous written discipline, performance improvement plan, or formal warning. The County had issued none.

74. Walker's employment terminated on August 9, 2024.

75. The County's stated reasons for terminating Walker's employment are pretextual. Throughout her employment, Walker received no formal written discipline, no performance improvement plan, and no documented warning. The County did not provide Walker any of the

contemporaneous performance documentation that would ordinarily accompany the deficiencies the County identified for the first time in the August 2, 2024 Notice of Termination.

76. The County's criticism of Walker's work performance began only after Walker submitted the 90-day onboarding survey on March 29, 2024 and within the same period in which Walker began the accommodation process. Before those events, Walker had received no criticism from Brooks or Gayles regarding the volume of her work, her call or email times, or her customer service.

77. Members of the public that Walker served submitted positive feedback about her customer service, including written commendations through the County's customer-satisfaction survey process. The contemporaneous customer feedback contradicts the County's characterization of Walker's performance.

78. Walker was subjected to heightened scrutiny and shifting performance standards that were not applied to similarly situated colleagues. Walker was the only employee in her unit required to submit detailed daily work logs. Walker's calls were monitored back-to-back. Walker was denied the same access to and ongoing use of the CTS system that her colleagues received, and her opportunities for hands-on training in the permits office were limited compared to those her colleagues regularly received. Walker was then criticized for errors and deficiencies in areas in which she had been denied the same training, tools, and practical experience extended to her colleagues.

79. Colleagues whose conduct was comparable to or more serious than the conduct for which Walker was criticized were not subjected to the heightened scrutiny, disciplinary-style meetings, or termination Walker received. Walker observed colleagues engage in conduct that included treating customers rudely, disconnecting customer calls, and having customer

complaints escalated to supervisors, yet those colleagues were not terminated. Walker observed colleagues arrive late, leave early, and remain inactive during scheduled work hours, yet those colleagues were not subjected to disciplinary-style meetings, daily work-log requirements, back-to-back call monitoring, or termination. Walker alone was singled out for heightened monitoring and adverse action.

80. The temporal proximity between Walker's protected activity and the County's adverse actions is closely compressed. The County terminated Walker's employment ten days after Walker submitted her July 23, 2024 written complaint to Jones, and approximately four months after Walker began submitting accommodation requests in late March 2024.

81. Brooks's statement to Rush that "it should not take that long for [Walker] to heal from a car injury" reflects animus toward Walker's disability and the medical treatment Walker required. The statement was made by Walker's first-line supervisor to Walker's second-level supervisor and concerned the recovery period for an injury for which Walker had requested accommodation.

82. The County's failure to engage in a complete interactive process, its refusal to provide any of the accommodations Walker's treating providers had recommended, and its termination of Walker's employment in the midst of the unresolved accommodation process further support the inference that the County's stated reasons for the termination are pretextual.

83. Brooks, Gayles, Rush, and Jones each acted within the scope of their employment with the County at all relevant times, and the County is liable for their conduct as alleged in this Complaint.

HARM CAUSED

84. As a direct and proximate result of the County's unlawful conduct, Walker has suffered and continues to suffer substantial harm.

85. Walker has suffered significant economic damages, including but not limited to: (a) loss of employment and regular income since August 9, 2024; (b) loss of the wages, benefits, leave accrual, and retirement contributions she would have received had the County provided reasonable accommodations and continued her employment; (c) loss of employer-sponsored health insurance, requiring Walker to seek alternative coverage during a period of ongoing medical treatment for her cervical and lumbar injuries, her autoimmune condition, and her depression; (d) the costs of pursuing alternative employment; and (e) damage to her professional reputation and future career prospects.

86. Since her termination, Walker has been forced to accept substantially lower-paying work to meet her financial obligations. Beginning in January 2025, Walker performed rideshare driving services for Uber, generating approximately \$20,000 in gross revenue during 2025. In January 2026, Walker began performing job-coaching services through Outstanding Possibilities. Neither position provides compensation, benefits, or career-development opportunities comparable to those Walker held at DPIE.

87. Walker has experienced significant emotional distress, mental anguish, humiliation, and loss of enjoyment of life as a direct result of the County's discriminatory and retaliatory conduct. The conduct caused and exacerbated Walker's recurrent major depressive disorder, which Walker's treating provider diagnosed in June 2024 in connection with the workplace conditions described in this Complaint. Walker has required ongoing therapeutic treatment to manage the anxiety, depression, and stress caused by the County's conduct.

88. The County's conduct also caused stress-related exacerbation of Walker's autoimmune thyroid condition. Walker's treating provider has documented Walker's reports that workplace stress manifested in physical symptoms, including chest tightness and tingling in her right arm.

89. Walker has suffered significant collateral harm as a result of the loss of income caused by the County's conduct. Walker's daughter was accepted to an Ivy League university but was unable to attend because Walker could no longer afford the costs of attendance following her termination. Walker has faced threatened foreclosure on her home. Walker was required to relocate her mother, for whom she had been providing care, to her sister's home because Walker could no longer maintain the necessary care arrangements.

90. The County's conduct was willful, deliberate, and undertaken with reckless indifference to Walker's rights under state and local law.

COUNT I

Disability Discrimination in violation of the Maryland Fair Employment Practices Act

91. Walker incorporates herein the allegations set forth in paragraphs 1 through 90, above.

92. The Maryland Fair Employment Practices Act prohibits an employer from failing or refusing to hire, discharging, or otherwise discriminating against any individual with respect to the individual's compensation, terms, conditions, or privileges of employment because of the individual's disability. Md. Code Ann., State Gov't § 20-606(a)(1).

93. At all times relevant to this Complaint, the County was an "employer" and Walker was an "employee" within the meaning of the MFEPA.

94. Walker is a qualified individual with a disability within the meaning of the MFEPA based on her diagnosed Graves' disease, cervical disc degeneration and lumbago with

sciatica, paresthesia of the right arm, and recurrent major depressive disorder. Each of these conditions substantially limits one or more major life activities, including concentrating, thinking, working, sleeping, sitting for prolonged periods, and the operation of Walker's endocrine system.

95. Walker was qualified for the position of Administrative Aide II. Walker performed the essential functions of her position with or without reasonable accommodation, performed customer-service functions throughout her employment, and received positive feedback from members of the public she served.

96. Walker suffered adverse employment actions, including but not limited to: (a) the heightened scrutiny and disparate treatment described in paragraphs 78 and 79, including the imposition of a daily work-log requirement applied to Walker alone, the back-to-back monitoring of Walker's calls, and the denial of the same access to and ongoing use of the CTS system and the same hands-on training opportunities provided to her colleagues; (b) the denial of internal transfer applications for which Walker was qualified; (c) the placement of Walker on administrative leave on August 2, 2024; and (d) the termination of Walker's employment effective August 9, 2024.

97. Each of these actions resulted in some harm to an identifiable term or condition of Walker's employment. The termination eliminated Walker's compensation, benefits, and continued employment with DPIE. The administrative leave removed Walker from the workplace and from her job duties. The heightened scrutiny, the daily work-log requirement, the back-to-back call monitoring, and the denial of the same access to the CTS system and hands-on training extended to her colleagues altered the conditions of Walker's employment by subjecting Walker to working conditions materially worse than those imposed on her colleagues.

98. The adverse employment actions occurred under circumstances giving rise to an inference of disability discrimination.

99. Brooks and Gayles had direct knowledge of Walker's specific medical diagnoses and the accommodations Walker's treating providers had recommended. Walker's medical documentation was forwarded to Brooks and Gayles at Brooks's instruction in or about April 2024.

100. Brooks's statement to Rush, as set forth in paragraph 60, reflects animus toward Walker's disability and the medical treatment Walker required.

101. The County's criticism of Walker's work performance began only after Walker submitted her 90-day onboarding survey in late March 2024 and within the same period in which Walker began the accommodation process. Before those events, Walker had received no criticism from Brooks or Gayles regarding the volume of her work, her call or email times, or her customer service.

102. Similarly situated employees outside Walker's protected class were treated more favorably than Walker, as described in paragraphs 78 and 79.

103. The County's stated reasons for its adverse actions are pretextual for the reasons set forth in paragraphs 80 through 82.

104. As a direct and proximate result of the County's unlawful disability discrimination in violation of MFEPA, Walker has suffered and continues to suffer substantial harm.

COUNT II
Disability Discrimination in violation of the Prince George's County Code

105. Walker incorporates herein the allegations set forth in paragraphs 1 through 90, above.

106. Subtitle 2, Division 12 of the Prince George's County Code prohibits an employer from failing or refusing to hire, discharging, or otherwise discriminating against any individual with respect to the individual's compensation, terms, conditions, or privileges of employment because of the individual's disability.

107. The allegations set forth in paragraphs 94 through 103, incorporated herein, establish that the County unlawfully discriminated against Walker, in violation of the Prince George's County Code.

108. As a direct and proximate result of the County's unlawful disability discrimination in violation of the Prince George's County Code, Walker has suffered and continues to suffer substantial harm.

COUNT III

Failure to Accommodate in violation of the Maryland Fair Employment Practices Act

109. Walker incorporates herein the allegations set forth in paragraphs 1 through 90, above.

110. The Maryland Fair Employment Practices Act requires an employer to provide reasonable accommodation for the known disability of an otherwise qualified employee, unless the employer can demonstrate that the accommodation would impose an undue hardship on the operation of the employer's business. Md. Code Ann., State Gov't § 20-606(a)(4).

111. Walker is a qualified individual with a disability within the meaning of Md. Code Ann., State Gov't § 20-601(b) for the reasons stated in paragraph 94, incorporated herein.

112. Walker was qualified for the position of Administrative Aide II and could perform the essential functions of the position with reasonable accommodation.

113. The County had actual knowledge of Walker's disabilities. Walker disclosed her Graves' disease diagnosis to DPIE during the application process. Walker submitted ADA

Reasonable Accommodation Request forms and ADA Medical Questionnaires completed by her treating providers in or about April 2024. Brooks and Gayles received Walker's medical documentation directly at Brooks's instruction. Rush conducted interactive engagement meetings with Walker on April 18, 2024 and June 3, 2024.

114. Walker requested specific reasonable accommodations supported by documentation from her treating providers, as set forth in paragraphs 34 through 36. Each of the accommodations Walker requested was reasonable. A sit-stand desk and ergonomic chair are commonly available office equipment that the County provides to other employees. Transfer or reassignment to an open position is a reasonable accommodation expressly contemplated under federal disability law and incorporated into Maryland disability law. Telework is a reasonable accommodation that the County provided to Walker's coworkers. Leave of absence is a reasonable accommodation expressly recognized under Maryland disability law.

115. The County failed to engage in a good-faith interactive process to identify a reasonable accommodation. Although Rush conducted initial meetings with Walker on April 18, 2024 and June 3, 2024, the County did not complete the interactive process. The County did not propose alternative accommodations after rejecting Walker's requests. The County did not implement any accommodation before Walker's termination.

116. The County did not provide Walker any of the accommodations Walker's treating providers had recommended. The County did not provide a sit-stand desk or ergonomic chair. The County did not transfer Walker to a light-duty position or to a different department, despite Walker's submission of multiple internal applications for transfer. The County rejected Walker's request for telework. The County did not grant Walker a leave of absence.

117. The County cannot demonstrate that providing the requested accommodations would have imposed an undue hardship on its operations. The County is a public employer with more than 500 employees within DPIE alone and operates dozens of departments and divisions across Prince George's County. The accommodations Walker requested were either commonly available office equipment, established workplace practices the County extended to other employees, or transfers to positions for which Walker was qualified and which were open and posted by the County during the relevant period.

118. As a direct and proximate result of the County's failure to provide reasonable accommodations in violation of MFEPA, Walker has suffered and continues to suffer substantial harm.

COUNT IV
Retaliation in violation of the Maryland Fair Employment Practices Act

119. Walker incorporates herein the allegations set forth in paragraphs 1 through 90, above.

120. The Maryland Fair Employment Practices Act prohibits an employer from retaliating against any individual because the individual has opposed any practice prohibited by MFEPA, or because the individual has made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under MFEPA. Md. Code Ann., State Gov't § 20-606(f).

121. Walker engaged in protected activity under MFEPA on multiple occasions, including: (a) submitting written requests for reasonable accommodations beginning in late March 2024 and continuing through the spring and summer of 2024; (b) submitting a complaint of discrimination to Gayles in approximately June 2024 alleging, among other things, that her requests for reasonable accommodations were being ignored and that she was being subjected to

retaliatory treatment; (c) raising concerns to Rush on multiple occasions regarding the failure to accommodate Walker's disabilities, the heightened scrutiny, and the disparate treatment Walker was experiencing; and (d) submitting a written complaint of discrimination, hostile work environment, and harassment to Jones on July 23, 2024.

122. Walker had a reasonable, good-faith belief that the conduct she opposed constituted unlawful disability discrimination, failure to accommodate, and hostile work environment in violation of MFEPA.

123. The County was aware of Walker's protected activity. Walker submitted her accommodation requests to Rush, who served as the County's ADA coordinator. Walker submitted her June 2024 complaint to Gayles, who was Walker's second-level supervisor. Walker submitted her July 23, 2024 written complaint to Jones, a Human Resources representative within DPIE. Following Walker's July 23, 2024 complaint to Jones, the substance of the complaint was disclosed to Brooks, who referenced specific issues from the confidential complaint during a subsequent meeting with Walker and approximately six colleagues.

124. The County took materially adverse actions against Walker following her protected activity. The materially adverse actions include, but are not limited to: (a) the heightened scrutiny and disparate treatment described in paragraphs 78 and 79, incorporated herein; (b) the denial of Walker's internal transfer applications; (c) the placement of Walker on administrative leave on August 2, 2024; and (d) the termination of Walker's employment effective August 9, 2024.

125. The materially adverse actions described in paragraph 124, incorporated herein, would have dissuaded a reasonable employee in Walker's position from making or supporting a charge of discrimination.

126. A causal connection exists between Walker's protected activity and the materially adverse actions taken by the County. The evidence supporting the causal connection includes: (a) the close temporal proximity between Walker's July 23, 2024 written complaint to Jones and the County's August 2, 2024 Notice of Termination, an interval of ten days; (b) the close temporal proximity between Walker's accommodation requests beginning in late March 2024 and the onset of heightened scrutiny and disparate treatment by Brooks and Gayles within the same timeframe; (c) the County's failure to provide any contemporaneous written discipline, performance improvement plan, or formal warning before issuing the August 2, 2024 Notice of Termination; (d) the disclosure of Walker's confidential July 23, 2024 complaint to Brooks, the very supervisor whose conduct was the subject of the complaint; and (e) the pattern of adverse actions that intensified following each of Walker's protected activities.

127. The County's stated reasons for its materially adverse actions are pretextual for the reasons set forth in paragraphs 80 through 82.

128. As a direct and proximate result of the County's unlawful retaliation in violation of MFEPA, Walker has suffered and continues to suffer substantial harm.

COUNT VIII
Retaliation in Violation of the Prince George's County Code

129. Walker incorporates herein the allegations set forth in paragraphs 1 through 91, above.

130. The same factual allegations set forth in paragraphs 121 through 127, incorporated herein, establish that Defendants unlawfully retaliated against Walker in violation of PGC Code § 2-209, and in doing so, actually and proximately caused her harm for which she is entitled to compensation.

PRAYER FOR RELIEF

For the foregoing reasons, Plaintiff Aisha Walker respectfully requests that this Court enter judgment in her favor and against Defendant Prince George’s County, Maryland, as follows:

- A. Declare that the County’s actions as described herein violated the Maryland Fair Employment Practices Act and the Prince George’s County Code;
- B. Award Walker back pay representing the wages and benefits she lost as a result of the County’s unlawful conduct, in a fair and reasonable amount to be determined at trial;
- C. Award Walker front pay representing future lost wages and benefits, in a fair and reasonable amount to be determined at trial, or in the alternative, order the County to reinstate Walker to a position commensurate with the position she would have held but for the County’s unlawful conduct, with all attendant benefits and seniority;
- D. Award Walker compensatory damages, in a fair and reasonable amount to be determined at trial;
- E. Award Walker the costs and fees she incurred in connection with this action, including reasonable attorney fees; and
- F. Grant Walker such other relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

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

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Dated: May 7, 2026

/s/ Jordan D. Howlette
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